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*Special Conflicts Counsel to the Official Committee of
Unsecured Creditors of Sears Holdings Corporation, et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
In re:	:	Chapter 11
	:	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	Case No. 18-23538 (RDD)
	:	
Debtors ¹	:	(Jointly Administered)
	:	
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**COVER SHEET FOR EIGHTH INTERIM AND FINAL APPLICATION OF
HERRICK, FEINSTEIN LLP AS SPECIAL CONFLICTS COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF PERIOD
JANUARY 2, 2019 THROUGH JUNE 30, 2022**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); SHC Licensed Business LLC (3718); SHC Promotions LLC (9626); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

<i>General Information</i>	
Name of Applicant:	Herrick, Feinstein LLP (“ <u>Herrick</u> ”)
Authorized to Provide Professional Services to:	The Official Committee of Unsecured Creditors and the Litigation Designees ²
Petition Date:	October 15, 2018
Date of Retention:	March 22, 2019 <i>nunc pro tunc</i> to January 2, 2019
Prior Applications:	7
<i>Summary of Interim and Final Fees and Expenses Sought in this Application</i>	
Period Covered by this Application:	March 1, 2022 through and including June 30, 2022 (the “ <u>Eighth Interim Compensation Period</u> ”), and January 2, 2019 through June 30, 2022 (the “ <u>Final Compensation Period</u> ”)
Amount of Compensation Sought as Actual, Reasonable and Necessary for the Eighth Interim Compensation Period:	\$29,355.50
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary for the Eighth Interim Compensation Period:	\$407.10
Total Compensation and Expenses Requested for the Eighth Interim Compensation Period:	\$29,762.60
Amount of Compensation Sought as Actual, Reasonable and Necessary for the Final Compensation Period:	\$3,910,104.00

² As described further herein, in addition to its role as special conflicts counsel to the Creditors’ Committee in connection with an investigation into the MTN Transactions (as defined herein), Herrick has been retained to serve as special conflicts counsel to act on behalf of the Litigation Designees to investigate, commence, prosecute and otherwise litigate certain matters in connection with the Jointly Asserted Causes of Action. *See Order (I) Confirming Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and Its Affiliated Debtors and (II) Granting Related Relief*, dated October 15, 2019 [ECF No. 5370] (the “Confirmation Order”) ¶ 22 (“In addition, without further order of this Court, the Litigation Designees may retain such additional professionals or consultants (including attorneys, accountants, appraisers, financial advisors, expert witnesses or other parties determined by the Initial Litigation Designees to have qualifications necessary or desirable to assist in the investigation, prosecution and/or settlement of the Jointly Asserted Causes of Action) . . .”).

Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary for the Final Compensation Period:	\$384,219.78
Total Compensation and Expenses Requested for the Final Compensation Period:	\$4,294,323.78 ³
Amount of Compensation Paid to Date	\$3,869,802.00
Amount of Expenses Paid to Date	\$383,912.68
Total Compensation and Expenses Paid to Date	\$4,253,714.68
Voluntary Fee Waiver and Expense Reduction During the Final Compensation Period:	\$14,818.45
Amount of Compensation Requested During Final Compensation Period Not Yet Paid	\$40,302.00
Amount of Expenses During Final Compensation Period Not Yet Paid	\$307.10
Total Compensation and Expenses for Final Compensation Period Not Yet Paid	\$40,609.10
<i>Summary of Fees and Expenses Allowed Pursuant to Prior Applications</i>	
Total Compensation Approved by Interim Order to Date:	\$3,834,060.50
Total Expenses Approved by Interim Order to Date:	\$383,302.99
Total Compensation and Expenses Approved by Interim Order to Date:	\$4,217,363.49
Total Allowed Compensation Paid to Date:	\$3,828,958.40
Total Allowed Expenses Paid to Date	\$383,302.99
Total Allowed Compensation and Expenses Paid to Date:	\$4,212,261.39

³ This total reflects a voluntary reduction of Herrick's fees during the Final Compensation Period, which relates to, among other things: (i) duplicative work or work performed by professionals or paraprofessionals billing a de minimis amount of time to the Chapter 11 Cases during the applicable period and (ii) fees incurred in connection with certain administrative tasks. Consequently, Herrick does not seek payment of these fees and expenses in this Application.

<i>Summary of Fees, Professionals, Rates and Budget in this Eighth Interim Application</i>	
Interim Compensation Sought in this Application Already Paid Pursuant to the Interim Compensation Order But Not Yet Allowed (80% of Fees):	\$5,307.20 ⁴
Interim Expenses Sought in this Application Already Paid Pursuant to the Interim Compensation Order But Not Yet Allowed (100% of Expenses):	\$100.00
Total Interim Compensation and Expenses Sought in this Application Already Paid Pursuant to the Interim Compensation Order But Not Yet Allowed:	\$5,407.20
Total Compensation and Expenses Sought in this Application Not Yet Paid:	\$24,355.40
Voluntary Fee Waiver and Expense Reduction in this Eighth Interim Compensation Period:	n/a
<i>Summary of Fees and Expenses Sought in this Eighth Interim Application</i>	
Blended Rate in this Application for All Attorneys:	\$867.23
Blended Rate in this Application for All Timekeepers:	\$778.66
Number of Timekeepers Included in this Application During the Eighth Interim Compensation Period:	4 (3 attorneys; 1 paraprofessional)
Number of Attorneys Billing Fewer than 15 Hours to the Case During the Eighth Interim Compensation Period:	N/A
Increase in Rates Since Date of Retention:	3 ⁵
Interim or Final Application:	Final

⁴ Herrick has received \$5,307.20 (80% of \$6,634.00 billed to the Debtors' carve-out account) as compensation for services rendered during the period of March 1, 2022 through March 31, 2022, as requested in the Twenty-Eighth Monthly Fee Statement (as defined below).

⁵ Herrick increased its rates on January 1, 2022, consistent with its customary practice and as disclosed in the Herrick Retention Application (as defined herein).

**SUMMARY OF MONTHLY FEE STATEMENTS FOR EIGHTH INTERIM
COMPENSATION PERIOD**

DATE FILED	ECF NO.	PERIOD COVERED	FEES REQUESTED	EXPENSES REQUESTED	FEES PAID	EXPENSES PAID
5/13/2022	10436	3/1/2022- 3/31/2022	\$5,307.20 (80% of \$6,634.00)	\$100.00	\$5,307.20	\$100.00
6/21/2022	10495	4/1/2022- 4/30/2022	\$2,852.00 (80% of \$3,565.00)	\$107.10	\$0	\$0
7/29/2022	10546	5/1/2022- 5/31/2022	\$4,585.20 (80% of \$5,731.50)	\$100.00	\$0	\$0
8/1/2022	10553	6/1/2022- 6/30/2022	\$10,740.00 (80% of \$13,425.00)	\$100.00	\$0	\$0

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in This Application Not Yet Paid During the Eighth Interim
Compensation Period: \$24,355.40

COMPENSATION BY PROFESSIONALS
MARCH 1, 2022 THROUGH JUNE 30, 2022

Name of Professional	Position	Department	Year Admitted	Hourly Billing Rate 2022	Total Hours Billed	Total Compensation
O'Donnell, Sean	Partner	Restructuring & Finance Litigation	1998	\$1,125.00	3.0	\$3,375.00
Carty, Christopher	Partner	Restructuring & Finance Litigation	2010	\$925.00	15.6	\$14,430.00
Kolb, Kyle J.	Partner	Restructuring & Finance Litigation	2012	\$715.00	11.0	\$7,865.00
Poretsky, Larisa	Paralegal	Restructuring & Finance Litigation	N/A	\$455.00	8.1	\$3,685.50

**TOTAL FEES FOR THE EIGHTH INTERIM COMPENSATION PERIOD
(MARCH 1, 2022 THROUGH JUNE 30, 2022)**

PROFESSIONALS	BLENDED RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Partners	\$867.23	29.6	\$25,670.00
Paraprofessionals	\$455.00	8.1	\$3,685.50
Blended Attorney Rate	\$867.23		
Blended Rate for All Timekeepers	\$778.66		
Total Fees Incurred		37.7	\$29,355.50

**TOTAL BY TASK CODE FOR THE EIGHTH INTERIM COMPENSATION PERIOD
(MARCH 1, 2022 THROUGH JUNE 30, 2022)**

TASK CODE⁶	TOTAL HOURS	TOTAL AMOUNT
Fee/Employment Applications - B160	9.9	\$5,410.50
Contested Matters - B190	27.8	\$23,945.00
Total	37.7	\$29,355.50

⁶ The fees related to task codes B160 and B190 are Herrick's fees attributable to the services it performs as counsel to the Creditors' Committee in connection with the Chapter 11 Cases, and such fees are paid out of the Debtors' carve-out account. Pursuant to the terms of the Plan and Confirmation Order, however, Herrick's fees and expenses attributable to the services it performs in connection with the Jointly Asserted Causes of Action are paid out of a segregated account established to provide initial funding for such litigation. *See* Confirmation Order ¶ 52(d). During the Eighth Interim Compensation Period, Herrick incurred no fees and expenses related to the Jointly Asserted Causes of Action.

**EXPENSE SUMMARY FOR THE EIGHTH INTERIM COMPENSATION PERIOD
(MARCH 1, 2022 THROUGH AND INCLUDING JUNE 30, 2022)**

Description	Amount billed
Pacer Charges	\$7.10
E-Discovery Data Hosting Minimum Charge	\$400.00
Total	\$407.10

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
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SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	Case No. 18-23538 (RDD)
	:	
Debtors ¹	:	(Jointly Administered)
	:	
	:	
	:	
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**EIGHTH INTERIM AND FINAL APPLICATION OF HERRICK, FEINSTEIN LLP
AS SPECIAL CONFLICTS COUNSEL TO THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE
PERIOD OF JANUARY 2, 2019 THROUGH JUNE 30, 2022**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); SHC Licensed Business LLC (3718); SHC Promotions LLC (9626); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Herrick Feinstein LLP (“Herrick”), special conflicts counsel to the Official Committee of Unsecured Creditors (the “Creditors’ Committee”) appointed in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) of Sears Holding Corporation and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby respectfully submits this application (the “Application”),² pursuant to sections 330(a) and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”), requesting final allowance of compensation for services rendered to the Creditors’ Committee and the Litigation Designees by Herrick in the amount of \$3,910,104.00 and for reimbursement of expenses incurred in connection therewith in the amount of \$384,282.78, which amounts are inclusive of (i) fees in the amount of \$29,355.50 and reimbursement of expenses in the amount of \$407.10 for the period of March 1, 2022 through June 30, 2022 (the “Eighth Interim Compensation Period”), and (ii) fees in the amount of \$3,880,748.50 and reimbursement of expenses in the amount of \$383,812.68 for the period of January 2, 2019 through February 28, 2022 (the “Prior Interim Compensation Periods” and, together with the Eighth Interim Compensation Period, the “Final Compensation Period”). In support of this Application, Herrick respectfully submits the declaration of Stephen B. Selbst, a partner at Herrick (the “Selbst Declaration”), which is attached hereto as **Exhibit A** and incorporated by reference into this Application. In further support of this Application, Herrick respectfully represents as follows.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Order (I) Confirming Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and Its Affiliated Debtors and (II) Granting Related Relief*, dated October 15, 2019 [ECF No. 5370] (the “Confirmation Order”) or the *Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and Its Affiliated Debtors* [ECF No. 4476] (the “Plan”), as applicable.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

2. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, and Local Bankruptcy Rule 2016-1. This Application has been prepared in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No. 796] (the “Interim Compensation Order”), the Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York (June 17, 2013) promulgated pursuant to Local Bankruptcy Rule 2016-1(a) (the “Local Guidelines”), and the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases, effective as of November 1, 2013 (the “U.S. Trustee Guidelines” and, together with the Local Guidelines, the “Fee Guidelines”).

4. The Chair (as defined herein) of the Creditors’ Committee has been given the opportunity to review this Application and has approved the compensation and reimbursement of expenses requested herein.

BACKGROUND

A. The Debtors’ Chapter 11 Cases

5. On October 15, 2018 (the “Petition Date”), and continuing thereafter, each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses as debtors in possession pursuant to Bankruptcy Code sections

1107(a) and 1108. The Chapter 11 Cases are jointly administered for procedural purposes only. No trustee or examiner has been appointed in the Chapter 11 Cases.

6. On October 24, 2018 (the “Formation Date”), the Office of the United States Trustee for Region 2 (the “U.S. Trustee”) appointed the Creditors’ Committee pursuant to Bankruptcy Code section 1102(a). *Notice of Appointment of Official Committee of Unsecured Creditors* [ECF No. 276]. The Creditors’ Committee currently comprises seven members.³ Simon Property Group, L.P. serves as chair of the Creditors’ Committee (the “Chair”).

B. Herrick’s Role as Special Conflicts Counsel in Connection with an Investigation of the MTN Transactions

7. On November 9, 2018, the Debtors filed an emergency motion [ECF No. 642] (the “Sale Motion”), seeking to monetize certain Medium-Term Notes Series B (the “MTNs”) issued by Debtor Sears Roebuck Acceptance Corp. (“SRAC”) (collectively, the “MTN Transactions”) in advance of an auction (the “CDS Auction”) to be conducted by the International Swaps and Derivatives Association (“ISDA”). The value of the MTNs spiked temporarily because of the demand for qualifying SRAC obligations to tender into the CDS Auction. *See* Sale Motion ¶ 11. The Debtors sought to capitalize on this opportunity and engaged Jefferies LLC to manage and conduct the sale process for the MTNs. On November 15, 2018, the Court granted the relief requested by the Sale Motion and entered an order approving the sale of the MTNs [ECF No. 826] (the “Sale Order”).

8. On January 2, 2019, the Creditors’ Committee selected Herrick as its special conflicts counsel in connection with the Chapter 11 Cases in order to investigate the MTN

³ The following entities currently comprise the Creditors’ Committee: (i) The Bank of New York Mellon Trust Company, N.A., as Indenture Trustee; (ii) Brixmor Operating Partnership, L.P.; (iii) Computershare Trust Company, N.A.; (iv) Oswaldo Cruz; (v) Pension Benefit Guaranty Corporation; (vi) Simon Property Group, L.P.; and (vii) Winiadaewoo Electronics America, Inc. *See Amended Notice of Appointment of Official Committee of Unsecured Creditors*, dated March 31, 2020 [ECF No. 7539].

Transactions. On February 13, 2019, the Creditors' Committee filed its application to retain and employ Herrick as its special conflicts counsel [ECF No. 2574] (the "Herrick Retention Application"), which application was authorized by an order of this Court dated March 21, 2019 [ECF No. 2936] (the "Herrick Retention Order").

9. The Herrick Retention Order authorizes the Creditors' Committee to retain and employ Herrick in accordance with Herrick's normal hourly rates and disbursement policies, *nunc pro tunc* to January 2, 2019, all as contemplated by the Herrick Retention Application. Specifically, the Herrick Retention Order authorizes Herrick to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

10. On January 12, 2019, Herrick, on behalf of the Creditors' Committee, filed a motion pursuant to Bankruptcy Rule 2004 [ECF No. 1557] seeking to examine certain CDS participants who were either involved with the MTN Transactions or who opposed the sale of the MTNs. On February 15, 2019, the Court entered the *Order Pursuant To Bankruptcy Code Sections 105 And 1103 And Federal Rules Of Bankruptcy Procedure 2004 And 9016 Authorizing The Examination Of The CDS Participants* [ECF No. 2628] (the "Rule 2004 Order"). Herrick serves as the Creditors' Committee special counsel with respect to the investigation authorized by the Rule 2004 Order (the "Rule 2004 Investigation").

C. Herrick's Role as Special Conflicts Counsel in Connection with Certain of the Jointly Asserted Causes of Action

11. On October 15, 2019, the Court entered the Confirmation Order [ECF No. 5370] approving the Plan. Pursuant to the Confirmation Order, the Creditors' Committee was granted joint standing with the Debtors to commence, prosecute, settle, and otherwise dispose of the: (i) Specified Causes of Action; (ii) other Preserved Causes of Action against the ESL Parties; (iii) all claims and causes of action asserted in the pending adversary proceeding captioned *Sears*

Holdings Corp. v. Lampert, Adv. Pro. 19-08250 (RDD) (Bankr. S.D.N.Y.) (the “Adversary Proceeding”) and any other claims or causes of action ancillary thereto; and (iv) claims or causes of action against insurance carriers related to coverage for claims asserted in the Adversary Proceeding (the foregoing referred to collectively as the “Jointly Asserted Causes of Action”).

12. Herrick serves as special conflicts counsel in connection with certain matters related to the Jointly Asserted Causes of Action, as overseen by the Litigation Designees.⁴

D. Prior Fee Applications and Monthly Fee Statements Filed During the Final Compensation Period⁵

13. On May 14, 2020, Herrick filed and served the *First Interim Fee Application of Herrick, Feinstein LLP as Special Conflict Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of January 2, 2019 Through and Including February 29, 2020* [ECF No. 7958] (the “First Interim Fee Application”). Pursuant to the First Interim Fee Application, Herrick requested interim allowance of fees in the amount of \$1,076,531.50 and reimbursement of expenses in the amount of \$14,827.17 for the period from January 2, 2019 through and including February 29, 2020. There were no objections to the First Interim Fee Application and, on June 18, 2020, the Court entered an order approving the First Interim Fee Application [ECF No. 8036] (the “Fourth Interim Fee Order”). Herrick has received payment for all fees and expenses approved in the Fourth Interim Fee Order.

⁴ Consistent with the terms of the Confirmation Order, which authorizes the Litigation Designees to retain additional attorneys in connection with prosecution of the Adversary Proceeding without further order of the Court, *see* Confirmation Order ¶ 22, Herrick has been retained as special conflicts counsel in connection with certain conflict matters related to the Jointly Asserted Causes of Action.

⁵ Herrick’s fees and expenses attributable to the services it performs as counsel to the Creditors’ Committee in connection with the Chapter 11 Cases are paid out of the Debtors’ carve-out account. Pursuant to the terms of the Plan and Confirmation Order, however, Herrick’s fees and expenses attributable to the services it performs in connection with the Jointly Asserted Causes of Action are paid out of a segregated account established to provide initial funding for such litigation. *See* Confirmation Order ¶ 52(d). During the Compensation Period, Herrick incurred no fees and expenses related to the Jointly Asserted Causes of Action.

14. On August 14, 2020, Herrick filed and served the *Second Interim Fee Application of Herrick, Feinstein LLP as Special Conflict Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of March 1, 2020 Through and Including June 30, 2020* [ECF No. 8374] (the “Second Interim Fee Application”). Pursuant to the Second Interim Fee Application, Herrick requested interim allowance of fees in the amount of \$1,185,248.50 and reimbursement of expenses in the amount of \$117,625.05 for the period from March 1, 2020 through and including June 30, 2020. There were no objections to the Second Interim Fee Application and, on October 15, 2020, the Court entered an order approving the Second Interim Fee Application [ECF No. 9009] (the “Fifth Interim Fee Order”). Herrick has received payment for all fees and expenses approved in the Fifth Interim Fee Order.

15. On December 15, 2020, Herrick filed and served the *Third Interim Fee Application of Herrick, Feinstein LLP as Special Conflict Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of July 1, 2020 Through and Including October 31, 2020* [ECF No. 9179] (the “Third Interim Fee Application”). Pursuant to the Third Interim Fee Application, Herrick requested interim allowance of fees in the amount of \$834,997.00 and reimbursement of expenses in the amount of \$179,163.84 for the period from July 1, 2020 through and including October 31, 2020. There were no objections to the Third Interim Fee Application and, on February 23, 2021, the Court entered an order approving the Third Interim Fee Application [ECF No. 9312] (the “Sixth Interim Fee Order”). Herrick has received payment for all fees and expenses approved in the Sixth Interim Fee Order.

16. On April 14, 2021, Herrick filed and served the *Fourth Interim Fee Application of Herrick, Feinstein LLP as Special Conflict Counsel to the Official Committee of Unsecured*

Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of November 1, 2020 Through and Including February 28, 2021 November 1, 2020 Through and Including February 28, 2021 [ECF No. 9410] (the “Fourth Interim Fee Application”). Pursuant to the Fourth Interim Fee Application, Herrick requested interim allowance of fees in the amount of \$565,994.50 and reimbursement of expenses in the amount of \$40,707.38 for the period from November 1, 2020 through and including February 28, 2021. There were no objections to the Fourth Interim Fee Application and, on June 2, 2021, the Court entered an order approving the Fourth Interim Fee Application [ECF No. 9545] (the “Seventh Interim Fee Order”). Herrick has received payment for all fees and expenses approved in the Seventh Interim Fee Order.

17. On August 16, 2021, Herrick filed and served the *Fifth Interim Fee Application of Herrick, Feinstein LLP as Special Conflict Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of March 1, 2021 Through and Including June 30, 2021* [ECF No. 9741] (the “Fifth Interim Fee Application”). Pursuant to the Fifth Interim Fee Application, Herrick requested interim allowance of fees in the amount of \$95,014.00 and reimbursement of expenses in the amount of \$551.16 for the period from March 1, 2021 through and including June 30, 2021. There were no objections to the Fifth Interim Fee Application and, on September 29, 2021, the Court entered an order approving the Fifth Interim Fee Application [ECF No. 9862] (the “Eighth Interim Fee Order”). Herrick has received payment for the bulk of the fees and expenses approved in the Eighth Interim Fee Order, except Herrick has not yet received payment for \$5,102.10 in fees approved related to Herrick’s work in connection with the Jointly Asserted Causes of Action.

18. On December 14, 2021, Herrick filed and served the *Sixth Interim Fee Application of Herrick, Feinstein LLP as Special Conflict Counsel to the Official Committee of Unsecured*

Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of July 1, 2021 Through and Including October 31, 2021 [ECF No. 10156] (the “Sixth Interim Fee Application”). Pursuant to the Sixth Interim Fee Application, Herrick requested interim allowance of fees in the amount of \$76,275.00 and reimbursement of expenses in the amount of \$30,428.89 for the period from July 1, 2021 through and including October 31, 2021. There were no objections to the Sixth Interim Fee Application and, on January 20, 2022, the Court entered an order approving the Sixth Interim Fee Application [ECF No. 10252] (the “Ninth Interim Fee Order”). Herrick has received payment for all fees and expenses approved in the Ninth Interim Fee Order.

19. On April 14, 2022, Herrick filed and served the *Seventh Interim Fee Application of Herrick, Feinstein LLP as Special Conflicts Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of November 1, 2021 Through February 28, 2022* [ECF No. 10396] (the “Seventh Interim Fee Application”). Pursuant to the Seventh Interim Fee Application, Herrick requested interim allowance of fees in the amount of \$46,688.00 and reimbursement of expenses in the amount of \$509.69 for the period from November 1, 2021 through and including February 28, 2022. As the Seventh Interim Fee Application has not yet been approved, Herrick has not received payment for \$11,151.60 in fees requested in that application, consisting of \$9,337.90 in fees subject to the holdback and an additional \$1,813.70 in fees related to Herrick’s work in connection with the Jointly Asserted Causes of Action.

20. On May 13, 2022, Herrick filed and served the *Twenty-Eighth Monthly Fee Statement of Herrick, Feinstein LLP for Professional Services Rendered and Disbursements Incurred as Special Conflicts Counsel to the Official Committee of Unsecured Creditors for the Period of March 1, 2022 Through March 31, 2022* [ECF No. 10436] (the “Twenty-Eighth Monthly

Fee Statement”),⁶ pursuant to which Herrick sought payment of (i) \$5,307.20 (80% of \$6,634.00) as compensation for professional services rendered and (ii) \$100.00 for reimbursement of expenses. Herrick did not receive any objections to the Twenty-Eighth Monthly Fee Statement and received payment in respect thereof on July 1, 2022.

21. On June 21, 2022, Herrick filed and served the *Twenty-Ninth Monthly Fee Statement of Herrick, Feinstein LLP for Professional Services Rendered and Disbursements Incurred as Special Conflicts Counsel to the Official Committee of Unsecured Creditors for the Period of April 1, 2022 Through April 30, 2022* [ECF No. 10495] (the “Twenty-Ninth Monthly Fee Statement”),⁷ pursuant to which Herrick sought payment of (i) \$2,852.00 (80% of \$3,565.00) as compensation for professional services rendered and (ii) \$107.10 for reimbursement of expenses. Herrick did not receive any objections to the Twenty-Ninth Monthly Fee Statement. Herrick has not yet received payment in respect of the Twenty-Ninth Monthly Fee Statement.

22. On July 29, 2022, Herrick filed and served the *Thirtieth Monthly Fee Statement of Herrick, Feinstein LLP for Professional Services Rendered and Disbursements Incurred as Special Conflicts Counsel to the Official Committee of Unsecured Creditors for the Period of May 1, 2022 Through May 31, 2022* [ECF No. 10546] (the “Thirtieth Monthly Fee Statement”),⁸ pursuant to which Herrick sought payment of (i) \$4,585.20 (80% of \$5,731.50) as compensation for professional services rendered and (ii) \$100.00 for reimbursement of expenses. The objection deadline for the Thirtieth Monthly Fee Statement is August 15, 2022. To date, there have been no

⁶ A copy of the Twenty-Eighth Monthly Fee Statement can be accessed at:
<https://restructuring.ra.kroll.com/sears/Home-DocketInfo?DockSearchValue=10436#>

⁷ A copy of the Twenty-Ninth Monthly Fee Statement can be accessed at:
<https://restructuring.ra.kroll.com/sears/Home-DocketInfo?DockSearchValue=10495#>

⁸ A copy of the Thirtieth Monthly Fee Statement can be accessed at:
<https://restructuring.ra.kroll.com/sears/Home-DocketInfo?DockSearchValue=10546#>

objections to the Thirtieth Monthly Fee Statement. Herrick has not yet received payment in respect of the Thirtieth Monthly Fee Statement.

23. On August 1, 2022, Herrick filed and served the *Thirty-First Monthly Fee Statement of Herrick, Feinstein LLP for Professional Services Rendered and Disbursements Incurred as Special Conflicts Counsel to the Official Committee of Unsecured Creditors for the Period of June 1, 2022 Through June 30, 2022* [ECF No. 10553] (the “Thirty-First Monthly Fee Statement” and, together with the Twenty-Eighth Monthly Fee Statement, Twenty-Ninth Monthly Fee Statement, Thirtieth Monthly Fee Statement, and Thirty-First Monthly Fee Statement, the “Monthly Fee Statements”),⁹ pursuant to which Herrick sought payment of (i) \$10,740.00 (80% of \$13,425.00) and (ii) \$100.00 for reimbursement of expenses. The objection deadline for the Thirty-First Monthly Fee Statement is August 15, 2022. To date, there have been no objections to the Thirty-First Monthly Fee Statement. Herrick has not yet received payment in respect of the Thirty-First Monthly Fee Statement.

**SUMMARY OF PROFESSIONAL COMPENSATION
AND REIMBURSEMENT OF EXPENSES REQUESTED**

24. By this Application, Herrick respectfully requests final allowance of compensation for professional services rendered to the Creditors’ Committee during the Final Compensation Period in the amount of \$3,910,104.00 and expense reimbursements of \$384,219.78. During the Final Compensation Period, Herrick attorneys and paraprofessionals expended a total of 7,048.8 hours for which compensation is sought.

25. Pursuant to this Application, Herrick seeks final approval of fees and expenses that were requested pursuant to the Monthly Fee Statements. A monthly summary of amounts billed

⁹ A copy of the Thirty-First Monthly Fee Statement can be accessed at: <https://restructuring.ra.kroll.com/sears/Home-DocketInfo?DockSearchValue=10553#>

by Herrick during the Eighth Interim Compensation Period and paid as of the date of this Application is set forth in the following chart:

DATE FILED	ECF NO.	PERIOD COVERED	FEES REQUESTED	EXPENSES REQUESTED	FEES PAID	EXPENSES PAID
5/13/2022	10436	3/1/2022-3/31/2022	\$5,307.20 (80% of \$6,634.00)	\$100.00	\$5,307.20	\$100.00
6/21/2022	10495	4/1/2022-4/30/2022	\$2,852.00 (80% of \$3,565.00)	\$107.10	\$0	\$0
7/29/2022	10546	5/1/2022-5/31/2022	\$4,585.20 (80% of \$5,731.50)	\$100.00	\$0	\$0
8/1/2022	10553	6/1/2022-6/30/2022	\$10,740.00 (80% of \$13,425.00)	\$100.00	\$0	\$0

26. The fees charged by Herrick in the Chapter 11 Cases are billed in accordance with Herrick's existing billing rates and procedures in effect during the Final Compensation Period. The rates Herrick charges for the services rendered by its professionals and paraprofessionals in the Chapter 11 Cases are the same rates Herrick charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market. The disclosures required by the U.S. Trustee Guidelines regarding the customary and comparable compensation are annexed hereto as **Exhibit B-1** and **Exhibit B-2**.

27. Herrick maintains computerized records of the time spent by all Herrick professionals and paraprofessionals in connection with its representation of the Creditors' Committee in the Chapter 11 Cases. A summary of compensation by timekeeper for the Eighth Interim Compensation Period and the Final Compensation Period are annexed hereto as **Exhibit C-1** and **Exhibit C-2**, respectively, and a summary of fees by task code for the Eighth Interim

Compensation Period and the Final Compensation Period are annexed hereto as **Exhibit D-1** and **Exhibit D-2**, respectively. A compilation of the itemized time records for Herrick professionals and paraprofessionals performing services for the Creditors' Committee during the Final Compensation Period, including the Eighth Interim Compensation Period, which have been filed and served upon the notice parties in accordance with the Interim Compensation Order, is annexed hereto as **Exhibit E**. The itemized time records for Herrick professionals and paraprofessionals performing services for the Creditors' Committee during the Final Compensation Period have been filed and served in the Monthly Fee Statements in accordance with the Interim Compensation Order.

28. Herrick also maintains records of all actual and necessary out-of-pocket expenses incurred in connection with the rendition of its professional services. A summary of the categories of expenses and amounts for which reimbursement is requested for the Eighth Interim Compensation Period and the Final Compensation Period are annexed hereto as **Exhibit F-1** and **Exhibit F-2**, respectively, and a detailed itemization of expenses for the Final Compensation Period, including the Second Interim Period, is annexed as **Exhibit G**.

**SUMMARY OF SERVICES PERFORMED BY
HERRICK DURING THE FINAL COMPENSATION PERIOD**

29. The services provided by Herrick during the Final Compensation Period were actual and necessary for the administration of the Chapter 11 Cases, performed at the request of the Creditors' Committee and the Litigation Designees, and commensurate with the complexity and significance of the matter. The variety and complexity of the issues in the Chapter 11 Cases and the need to act or respond to such issues on an expedited basis in furtherance of the Creditors' Committee's and the Litigation Designees' needs and the interests of the Debtors' unsecured

creditors required the expenditure of significant time by Herrick professionals and paraprofessionals from numerous legal disciplines during the Final Compensation Period.

30. The following is a summary of the professional services rendered by Herrick during the Final Compensation Period. This summary is organized in accordance with the ABA Bankruptcy Code Set, commonly used in bankruptcy matters. In classifying services into task codes, Herrick attempted to place the services performed in the category that most closely related to the services provided. The below does not include summaries for certain task codes for which a *de minimis* amount of time was billed during the Final Compensation Period.

31. Moreover, the following summary of services rendered during the Final Compensation Period is not intended to be a detailed description of the work performed. Rather, it merely is an attempt to highlight certain of those areas in which services were rendered to the Creditors' Committee and the Litigation Designees, as well as to identify some of the matters and issues that Herrick was required to address during the Final Compensation Period.

B110 - CASE ADMINISTRATION

Interim Period	Total Hours	Fees
First Interim Period	174.9	\$78,666.00
Second Interim Period	N/A	N/A
Third Interim Period	N/A	N/A
Fourth Interim Period	N/A	N/A
Fifth Interim Period	N/A	N/A
Sixth Interim Period	N/A	N/A
Seventh Interim Period	N/A	N/A
Eighth Interim Period	N/A	N/A
Final Compensation Period	174.9	\$78,666.00

32. This category includes time spent by Herrick professionals and paraprofessional performing various administrative services in order to represent the Creditors' Committee effectively and efficiently, including, among other things, (i) reviewing and analyzing pleadings and other documents filed by the Debtors and third parties relating to the Rule 2004 Investigation and the Jointly Asserted Causes of Action; (ii) apprising Herrick attorneys and paraprofessionals of recent filings and upcoming deadlines; (iii) preparing internal task lists and case calendars; and (iv) communicating with Akin Gump, primary counsel to the Creditors' Committee.

33. Herrick professionals and paraprofessionals also monitored the dockets for the Chapter 11 Cases, the Adversary Proceeding and all appeals to remain apprised of all critical matters. For each significant filing, Herrick professionals and paraprofessionals worked to ensure that the appropriate parties were notified of its contents, relevant response deadlines, hearing dates and any other critical matters related thereto.

34. Herrick believes it was able to address all issues relating to case administration that have arisen during the pendency of the Chapter 11 Cases and the Adversary Proceeding in an effective and efficient manner.

B160 - FEE/EMPLOYMENT APPLICATIONS

Interim Period	Total Hours	Fees
First Interim Period	169.3	\$82,666.00
Second Interim Period	87.7	\$50,165.50
Third Interim Period	35.1	\$18,335.00
Fourth Interim Period	47.8	\$27,003.50
Fifth Interim Period	26.1	\$13,605.00
Sixth Interim Period	24.4	\$13,909.50
Seventh Interim Period	15.1	\$7,341.00
Eighth Interim Period	9.9	\$5,410.50

Final Compensation Period	415.4	\$218,436.00
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35. This category includes the time spent by Herrick professionals and paraprofessionals (i) reviewing the Interim Compensation Order, the U.S. Trustee Guidelines and the Local Guidelines regarding allowable fees and expenses; (ii) reviewing Herrick invoices for privileged or confidential information and for compliance with the U.S. Trustee Guidelines; and (iii) preparing and drafting, *inter alia*: (a) the Seventh Interim Fee Application; and (b) the Monthly Fee Statements. This category also includes the time spent by Herrick professionals preparing for, and attending, the hearings on the Interim Fee Applications.

36. Pursuant to the Interim Compensation Order, each of the Monthly Fee Statements contained a list of individuals who rendered services to the Creditors' Committee and/or the Litigation Designees during the relevant compensation period, information as to each individual's title, billing rate and hours worked, and a comprehensive breakdown of the fees incurred, and disbursements expended. To minimize costs in connection with this time-intensive process, Herrick relied on paraprofessionals to prepare the initial drafts of the Seventh Interim Fee Application and the Monthly Fee Statements, thereby limiting the time spent by attorneys on the review of fees, where reasonably practicable.

B190 - CONTESTED MATTERS (EXCLU. ASSUMPTION/REJECTION)

Interim Period	Total Hours	Fees
First Interim Period	821.8	\$575,280.00
Second Interim Period	212.0	\$111,556.50
Third Interim Period	261.6	\$156,245.00
Fourth Interim Period	95.8	\$58,875.00
Fifth Interim Period	74.0	\$55,898.50
Sixth Interim Period	94.0	\$62,366.00
Seventh Interim Period	43.1	\$37,079.50

Eighth Interim Period	37.7	\$29,355.50
Final Compensation Period	1,640.0	\$1,086,656.00

37. This category includes time spent by Herrick professionals and paraprofessionals in connection with their role as Special Conflicts Counsel to the Creditors' Committee, pursuant to the Herrick Retention Order.

38. In furtherance of the Rule 2004 Order, during the Final Compensation Period, Herrick professionals and paraprofessionals, among other things: (i) conducted the Rule 2004 Investigation, as authorized by the Rule 2004 Order, of the Debtors' sale of certain MTNs issued by Debtor SRAC (the "MTN Auction") and is authorized to obtain, and obtained extensive, discovery from certain participants in the MTN Auction (the "CDS Participants"); (ii) analyzed potential estate claims resulting from the Rule 2004 Investigation and standing issues for asserting such claims; (iii) discussed such claims and their potential benefit to the estates with advisors to the Debtors; and (iv) discussed such claims and their potential benefits to the estates with the Creditors' Committee.

39. This work included thorough analysis of documents produced by the CDS Participants (which included negotiating with the CDS Participants' counsel regarding the scope of such productions) and certain publicly available information, extensive discussion of the underlying facts of the MTN Investigation with the consultants retained by the Creditors' Committee, generating work product in preparation for interviews, interviewing representatives from certain CDS Participants, and drafting analyses of the potential claims for the Creditors' Committee. Furthermore, the consultants generated their own work product regarding certain aspects of the CDS marketplace, the ISDA auction process, and data and information provided by the CDS Participants, which we analyzed and relied upon.

JOINTLY ASSERTED CAUSES OF ACTION

Interim Period	Total Hours	Fees
First Interim Period	555.6	\$334,508.00
Second Interim Period	1,972.1	\$1,023,526.50
Third Interim Period	1,249.8	\$660,417.00
Fourth Interim Period	989.6	\$480,116.00
Fifth Interim Period	48.5	\$25,510.50
Sixth Interim Period	N/A	0.00
Seventh Interim Period	2.8	\$2,267.50
Final Compensation Period	4,818.4	\$2,526,345.50

40. This category includes time spent by Herrick professionals and paraprofessionals in connection with their role as Special Conflicts Counsel to the Litigation Designees as to the Cyrus Defendants¹⁰ and certain recipients of third-party subpoenas in the Adversary Proceeding.

41. During the Final Compensation Period, Herrick attorneys, *inter alia*: (i) opposed the motion to dismiss filed by the Cyrus Defendants, which included attending and presenting argument at the hearing on that motion; (ii) pursued discovery from the Cyrus Defendants; (iii) pursued discovery from recipients of certain third-party subpoenas, including multiple law firms that represented the Debtors prior to the Petition Date in connection with certain events at issue in the Adversary Proceeding, the Debtors' auditor, and other third-party participants in the events at issue in the Adversary Proceeding; and (iv) analyzed potential additional claims in connection with the Adversary Proceeding.

¹⁰ As defined in the First Amended Adversary Complaint, the "Cyrus Defendants" are the following entities: Cyrus Capital Partners, LP; Crescent 1, LP; Canary SC Fund, LP; CYR Fund, LP; CMH VI, LP; Cyrus Opportunities Master Fund II, Ltd.; CRS Master Fund, LP; Canary SC Master Fund, LP; Cyrus Select Opportunities Master Fund, Ltd.; Cyrus Special Strategies Master Fund, LP; and Cyrus 1740 Master Fund, LP.

ACTUAL AND NECESSARY DISBURSEMENTS

42. Herrick seeks allowance of reimbursement of expenses in the amount of \$384,282.78 for expenses incurred during the Final Compensation Period in the course of providing professional services to the Creditors' Committee. Herrick's disbursement policies pass through all out-of-pocket expenses at actual cost or an estimated actual cost when the actual cost is difficult to determine. For example, as it relates to computerized research, Herrick believes that it does not make a profit on that service as a whole although the cost of any particular search is difficult to ascertain. Other reimbursable expenses (whether the service is performed by Herrick in-house or through a third party vendor) include, but are not limited to, long-distance calls, overtime meals, deliveries, court costs, transcript fees, discovery and temporary legal staffing services, travel, and clerk fees.

FACTORS TO BE CONSIDERED IN AWARDING ATTORNEYS' FEES

43. Bankruptcy Code section 330 provides, in relevant part, that the Court may award to a professional person "reasonable compensation for actual, necessary services rendered[.]"

See 11 U.S.C. § 330(a)(1). In turn, Bankruptcy Code section 330 provides as follows:

In determining the amount of reasonable compensation to be awarded, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and

- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonably based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

44. The clear Congressional intent and policy expressed in Bankruptcy Code section 330 is to provide for adequate compensation in order to continue to attract qualified and competent bankruptcy practitioners to bankruptcy cases. *In re Drexel Burnham Lambert Grp., Inc.*, 133 B.R. 13, 20 (Bankr. S.D.N.Y. 1991) (“Congress’ objective in requiring that the market, not the Court, establish attorneys’ rates was to ensure that bankruptcy cases were staffed by appropriate legal specialists.”); *In re Busy Beaver Bldg. Ctrs., Inc.*, 19 F.3d 833, 850 (3d. Cir.1994) (citations and internal quotations omitted) (“Congress rather clearly intended to provide sufficient economic incentive to lure competent bankruptcy specialists to practice in the bankruptcy courts.”).

45. In assessing the “reasonableness” of the fees requested, the Second Circuit has stated that courts should consider the factors enumerated in *Johnson v. Ga. Highway Express, Inc.*, while also incorporating the “lodestar method.” *See Arbor Hill Concerned Citizens Neighborhood Ass’n v. County of Albany and Albany County Bd. of Elections*, 522 F.3d 182, 190 (2d Cir. 2007) (citing *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714 (5th Cir.1974), *abrogated on other grounds by Blanchard v. Bergeron*, 489 U.S. 87, 92-93, 96 (1989)). The “lodestar method” of calculating the reasonable fee contemplates “the number of hours reasonably expended . . . multiplied by a reasonable hourly rate.” *See Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983); *Gisbrecht v. Barnhart*, 535 U.S. 789, 801 (2002); *Perdue v. Kenny A.*, 130 S.Ct. 1662, 1672 (2010); *In re Drexel Burnham Lambert Grp., Inc.*, 133 B.R. 13 (Bankr. S.D.N.Y. 1991). The factors set forth in *Johnson* and *In re First Colonial Corp. of Am.*, 544 F.2d 1291, 1298-99 (5th

Cir. 1977) have been adopted by most courts.¹¹ See *In re Nine Assocs., Inc.*, 76 B.R. 943, 945 (S.D.N.Y. 1987) (adopting *First Colonial/Johnson* analysis); *In re Cuisine Magazine, Inc.*, 61 B.R. 210, 212-13 (Bankr. S.D.N.Y. 1986) (same); *Green v. City of New York*, 403 F. App'x 626, 629 (2d Cir. 2010) (summary order); see generally 3 COLLIER ON BANKRUPTCY ¶ 330.03[9] (Lawrence P. King ed., 16th ed. 2016) (describing *First Colonial* and *Johnson* as the “leading cases to be considered in determining a reasonable allowance of compensation”).

46. Herrick respectfully submits that a consideration of these factors should result in the Court's allowance of the full compensation sought in this Application.

- a. Time and Labor Required. Herrick billed a total of 6,206.7 hours of professional services and 842.1 hours of paraprofessional and other non-legal services during the Final Compensation Period. As evidenced by this Application, Herrick professionals and paraprofessionals worked diligently and efficiently without unnecessary duplication of efforts throughout the Final Compensation Period. This is especially true when considering the nature and complexity of the issues that arose in the Chapter 11 Cases during the Final Compensation Period. In particular, the Compensation Period involved many material issues that required a favorable resolution for the Debtors' estates, including, among other things, the Rule 2004 Investigation and the Jointly Asserted Causes of Action, described in greater detail above. Herrick's representation of the Creditors' Committee and Litigation Designees has required it to balance the need to provide quality services with the need to represent these parties in an effective, efficient and timely manner. Herrick respectfully submits that the hours spent were reasonable given the size and complexity of the Chapter 11 Cases, the significant legal issues raised, and the numerous pleadings filed in the Chapter 11 Cases.
- b. Novelty and Difficulty of the Questions. Herrick tasked knowledgeable attorneys to research, analyze and provide advice on difficult and complex bankruptcy, litigation, finance and other issues. As further described herein, Herrick's skilled teams assisted the Creditors' Committee in evaluating, among other things, the bases for various claims against certain CDS Participants in connection with the Rule 2004 Investigation and assisted the

¹¹ The factors articulated by the Fifth Circuit in *First Colonial* were first articulated by the Fifth Circuit in *Johnson*, with the *First Colonial* Court adding the factor of the “spirit of economy,” which was later rejected by Congress. See *Stroock & Stroock & Lavan v. Hillsborough Holdings Corp. (In re Hillsborough Holdings Corp.)*, 127 F.3d 1398, 1403 (11th Cir. 1997).

Litigation Designees in connection with the claims and causes of action subject to the First Amended Adversary Complaint.

- c. Skill Requisite to Perform the Legal Services Properly. Herrick believes that its recognized expertise in the area of bankruptcy litigation and corporate restructuring, its ability to draw from highly experienced professionals in other areas of Herrick's practice and its creative approach to the resolution of issues has benefited the Debtors, the Creditors' Committee and the Litigation Designees. Due to the nature and complexity of the legal issues Herrick was retained to investigate and/or prosecute in the Chapter 11 Cases, Herrick was required to exhibit a high degree of legal skill in areas related to, *inter alia*, bankruptcy, litigation, finance and corporate transaction matters. Additionally, Herrick's strong working relationship with the Creditors' Committee's other legal and financial advisors as well as the legal and financial advisors to other parties in interest enabled Herrick to work with such advisors towards a swift, consensual resolution of many of the salient issues in the Rule 2004 Investigation and the Jointly Asserted Causes of Action.
- d. Preclusion of Other Employment by Applicant Due to Acceptance of the Case. Although Herrick's representation of the Creditors' Committee and the Litigation Designees did not preclude its acceptance of new clients, the demands for immediate and substantive action in connection with the Rule 2004 Investigation and the Jointly Asserted Causes of Action imposed significant burdens on Herrick professionals and paraprofessionals working concurrently on other matters.
- e. Customary Fee. The rates Herrick charges for the services rendered by its professionals and paraprofessionals in the Chapter 11 Cases are the same rates Herrick charges for professional and paraprofessional services rendered in comparable non-bankruptcy matters. Herrick's fee structure also is equivalent to the fee structure used by Herrick for restructuring, workout, bankruptcy, insolvency and comparable matters, as well as similar complex corporate and litigation matters, whether in-court or otherwise, regardless of whether a fee application is required. The firm's customary hourly rates and rate structure reflect that restructuring and related matters typically involve great complexity, numerous tasks requiring a high level of expertise and severe time pressures, as is the case here. Herrick's rate structure is similar to the rate structure used by other, similar law firms that work on other, similar matters.
- f. Whether the Fee Is Fixed or Contingent. Pursuant to Bankruptcy Code sections 330 and 331, all fees sought by professionals employed under Bankruptcy Code section 1103 are contingent pending final approval by the Court and are subject to adjustment depending upon the services rendered and the results obtained. The contingency of full and actual compensation to Herrick increased the risk Herrick was assuming by representing the

Creditors' Committee and Litigation Designees as special conflicts counsel in the Chapter 11 Cases.

- g. Time Limitations Imposed by the Client or Other Circumstances. As previously set forth herein, Herrick was required to attend to certain issues arising in the Rule 2004 Investigation and Jointly Asserted Causes of Action under compressed timelines. The tremendous efforts of Herrick professionals and paraprofessionals in completing this work permitted the Creditors' Committee and Litigation Designees to address effectively various issues for the benefit of the Debtors' unsecured creditors.
- h. Amount Involved and Results Obtained. Herrick professionals and paraprofessionals worked diligently to maximize value for the Debtors' estates and creditors. During the Compensation Period, and as described in the summary of services herein, Herrick was instrumental in maximizing value for the benefit of unsecured creditors. In particular, Herrick's efforts in connection with, among other things, the Rule 2004 Investigation and the Jointly Asserted Causes of Action, effectively maximized the potential assets available for distribution to unsecured creditors. Herrick respectfully submits that the fees requested in this Application are reasonable and appropriate when considering the results obtained on behalf of unsecured creditors as more fully described in the summary of services.
- i. Experience, Reputation and Ability of Attorneys. Attorneys in Herrick's Finance Litigation & Restructuring group are consistently recognized as leading attorneys in the field of bankruptcy and bankruptcy related litigation as well as creditors' rights, business reorganizations and liquidations under chapter 11 of the Bankruptcy Code. During the Compensation Period, Herrick solicited the skill and expertise of its attorneys, a number of which have practiced law for over 20 years in a number of jurisdictions and legal disciplines. Herrick attorneys have actively represented creditors and creditors' committees, as well as other parties in interest, in a number of the nation's largest chapter 11 cases, including *In re The Weinstein Company Holdings*, *In re Blackhawk Mining, Inc.*, *In re Whiting Petroleum Corp.*, *In re Boston Generating, LLC*, *In re Toys "R" Us, Inc.*, *In re GMX Resources, Inc.*, *In re Energy Future Holdings Corp.*, *In re Dynegy Holdings, LLC*, *In re Edison Mission Energy, Inc.*, *In re Loehmann's Holdings, Inc.*, *In re Global Aviation Holdings, Inc.*, *In re Anderson News, LLC*, *In re Trico Marine Services*, *In re American Safety Razor*, *In re Visteon Corp.*, *In re ATX Communications, Inc.*, *In re Global Crossing*, *In re Exide Communications*, *Loral Space and Communications* and *In re X0 Communications, Inc.*, and many others. Herrick's extensive experience enables it to perform the services described herein competently and expeditiously.
- j. "Undesirability" of the Cases. This factor is not applicable to the Chapter 11 Cases.

- k. Nature and Length of Professional Relationship. Herrick has been rendering professional services to the Creditors' Committee since it was selected as counsel to the Creditors' Committee on January 2, 2019.

47. For the reasons set forth above, the services rendered by Herrick were necessary and beneficial to the Creditors' Committee and the Litigation Designees and consistently performed in a timely manner. The compensation sought in this Application is reasonable in light of the value of such services to the Creditors' Committee, the Litigation Designees and all unsecured creditors, Herrick's demonstrated skill and expertise in the bankruptcy field (as well as other areas of expertise relevant to the Chapter 11 Cases) and the customary compensation charged by comparably skilled practitioners at Herrick. Accordingly, Herrick respectfully submits that the Court should approve the compensation for professional services and reimbursement of expenses sought herein.

48. No agreement or understanding exists between Herrick and any other person for the sharing of any compensation to be received for professional services rendered or to be rendered in connection with the Chapter 11 Cases. Except for the filing of the Prior Interim Fee Applications and the Monthly Fee Statements, no prior application has been made in this Court or in any other court for the relief requested herein as it relates to the Final Compensation Period.

ATTORNEY STATEMENT PURSUANT TO U.S. TRUSTEE GUIDELINES

49. The following is provided in response to the request for additional information set forth in ¶ C.5. of the U.S. Trustee Guidelines.

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Response: No.

Question: If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: Not applicable.

Question: Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.

Response: No.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: See above.

Question: If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

Response: Herrick disclosed to the Creditors' Committee the hourly rates charged at the time of its retention. Herrick increased its rates on January 1, 2022, consistent with its customary practice and as disclosed in the Herrick Retention Application (as defined herein).

RESERVATION OF RIGHTS

To the extent that there are services rendered or expenses incurred that relate to the Final Compensation Period but were not processed prior to the preparation of the Application, Herrick reserves the right to request additional compensation for such services and reimbursement of such expenses in a future application.

CONCLUSION

WHEREFORE, Herrick respectfully requests final allowance of fees in the amount of \$3,910,104.00 as compensation for professional services rendered and the sum of \$384,219.78 as reimbursement of actual necessary costs and expenses.

Dated: New York, New York
August 9, 2022

HERRICK, FEINSTEIN LLP

By: /s/ Stephen B. Selbst
Sean E. O'Donnell
Stephen B. Selbst
Steven B. Smith
Christopher Carty
Two Park Avenue
New York, NY 10016
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sselbst@herrick.com
ssmith@herrick.com
ccarty@herrick.com

*Special Conflicts Counsel to the Official Committee of
Unsecured Creditors of Sears Holdings Corporation, et
al.*

EXHIBIT A

CERTIFICATION OF STEPHEN B. SELBST

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X	
In re:	: Chapter 11
	: :
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	: Case No. 18-23538 (RDD)
	: :
Debtors ¹	: (Jointly Administered)
	: :
	: :
----- X	

**CERTIFICATION UNDER THE FEE GUIDELINES IN RESPECT OF THE
EIGHTH INTERIM AND FINAL FEE APPLICATION OF HERRICK, FEINSTEIN
LLP AS SPECIAL CONFLICTS COUNSEL TO THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE
PERIOD OF JANUARY 2, 2019 THROUGH JUNE 30, 2022**

I, Stephen B. Selbst, hereby certify that:²

1. I am a partner with Herrick, a law firm with its main office located at 2 Park Avenue, New York, New York. Herrick is special conflicts counsel to the Creditors'

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); SHC Licensed Business LLC (3718); SHC Promotions LLC (9626); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

² Capitalized terms used herein but otherwise not defined shall have the meanings ascribed to such terms in the Application.

Committee of Sears Holdings Corporation and its affiliated debtors and debtors in possession (collectively, the “Debtors”) and also serves, pursuant to the Confirmation Order, as special conflicts counsel in connection with certain conflicts matters relating to the Adversary Proceeding.

2. In accordance with the Fee Guidelines, this certification is made with respect to the Application, for interim allowance of compensation and reimbursement of expenses incurred during the Compensation Period.

3. In respect of section B.1 of the Local Guidelines, I certify that:

- (a) I have read the Application;
- (b) to the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Fee Guidelines;
- (c) the fees and disbursements sought are billed at rates in accordance with those customarily charged by Herrick and generally accepted by Herrick’s clients; and
- (d) in providing a reimbursable service, Herrick does not make a profit on that service, whether the service is performed by Herrick in-house or through a third party.

4. In accordance with section B.2 of the Local Guidelines and as required by the Interim Compensation Order, I certify that Herrick has complied with those provisions requiring it to provide the Debtors and the Creditors’ Committee with a statement of Herrick’s fees and disbursements accrued during the previous month, although, due to administrative limitations, such statements were not always provided within the timeframe set forth in the Local Guidelines or the Interim Compensation Order.³

5. In respect of section B.3 of the Local Guidelines, I certify that the Debtors, the U.S. Trustee and the members of the Creditors’ Committee are each being provided with a copy of the Application.

³ We have been sending Herrick’s weekly accrual information to M-III Partners, L.P., the Debtors’ restructuring advisors, since the Summer of 2019, on a weekly basis or as soon thereafter as was reasonably practicable.

Dated: New York, New York
August 9, 2022

By: /s/ Stephen B. Selbst
Stephen B. Selbst

EXHIBIT B-1

**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURE DURING THE
EIGHTH INTERIM COMPENSATION PERIOD (MARCH 1, 2022 THROUGH JUNE
30, 2022)**

Blended Hourly Rates		
Category of Timekeeper	Billed by Herrick Timekeepers for Preceding Year¹	Billed in this Application
Partner	\$864.29	\$867.23
Paraprofessionals	\$385.77	\$455.00
All Timekeepers Aggregated	\$670.67	\$778.66

¹ Consistent with the U.S. Trustee Guidelines, this **Exhibit B-1** discloses the average hourly rate for the aggregate of all timekeepers in the domestic offices of Herrick, segregated by category. This data is based on Herrick's prior completed fiscal year.

EXHIBIT B-2

**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURE DURING THE
FINAL COMPENSATION PERIOD (JANURY 2, 2019 THROUGH JUNE 30, 2022)**

Blended Hourly Rates		
Category of Timekeeper	Billed by Herrick Timekeepers for Final Compensation Period²²	Billed in Final Compensation Period
Partner	\$864.29	\$849.18
Counsel	\$792.00	\$648.83
Associate	\$468.54	\$429.10
Paraprofessionals	\$385.77	\$352.77
All Timekeepers Aggregated	\$670.67	\$554.64

²² Consistent with the U.S. Trustee Guidelines, this **Exhibit B-2** discloses the average hourly rate for the aggregate of all timekeepers in the domestic offices of Herrick, segregated by category. This data is based on Herrick's prior applicable completed fiscal years.

EXHIBIT C-1

**SUMMARY OF COMPENSATION BY TIMEKEEPER FOR THE EIGHTH INTERIM
COMPENSATION PERIOD**

Name of Professional	Position	Dep't²³	Year Admitted	Hourly Billing Rate 2022	Total Hours Billed	Total Compensation
O'Donnell, Sean	Partner	RFL	1998	\$1,125.00	3.0	\$3,375.00
Carty, Christopher	Partner	RFL	2010	\$925.00	15.6	\$14,430.00
Kolb, Kyle J.	Partner	RFL	2012	\$715.00	11.0	\$7,865.00
Poretsky, Larisa	Paralegal	RFL	N/A	\$455.00	8.1	\$3,685.50

²³ “RFL” refers to the Restructuring & Finance Litigation department.

EXHIBIT C-2

**SUMMARY OF COMPENSATION BY TIMEKEEPER FOR THE FINAL
COMPENSATION PERIOD**

Name of Professional	Position	Dep't ²⁴	Year Admitted	Hourly Billing Rate 2019	Total Hours Billed 2019	Hourly Billing Rate 2020	Total Hours Billed 2020	Hourly Billing Rate 2021	Total Hours Billed 2021	Hourly Billing Rate 2022	Total Hours Billed 2022	Total Compensation
O'Donnell, Sean	Partner	RFL	1998	\$985	91.3	\$1,025	144.1	\$1,075	26.9	\$1,125	3.5	\$270,488.00
Selbst, Stephen B.	Partner	RFL	1984	\$975	34.4	\$1,000	1.7	N/A	0	N/A	0	\$35,240.00
Carty, Christopher	Partner ²⁵	RFL	2010	\$610	182.3	\$785	741.8	\$850	138.3	\$925	38.8	\$846,961.00
Kolb, Kyle J.	Partner ²⁶	RFL	2012	N/A	0	\$610	722.0	\$690	153.1	\$715	11.7	\$554,424.50
Smith, Steven B.	Partner ²⁷	RFL	2001	\$725	335.1	\$765	38.6	N/A	0	N/A	0	\$272,476.50
D'Angelo, Jason A.	Partner	RFL	1998	\$810	29.5	\$845	90.4	N/A	0	N/A	0	\$100,283.00

²⁴ "RFL" refers to the Restructuring & Finance Litigation department.

²⁵ Effective January 1, 2020.

²⁶ Effective January 1, 2022.

²⁷ Effective January 1, 2020.

Name of Professional	Position	Dep't ²⁴	Year Admitted	Hourly Billing Rate 2019	Total Hours Billed 2019	Hourly Billing Rate 2020	Total Hours Billed 2020	Hourly Billing Rate 2021	Total Hours Billed 2021	Hourly Billing Rate 2022	Total Hours Billed 2022	Total Compensation
King, David R.	Partner	Litigation	1999	\$875	60.1	N/A	N/A	N/A	0	N/A	0	\$52,587.50
Robinson, Heather	Partner ²⁸	Litigation	2006	\$570	7.2	N/A	0	N/A	0	N/A	0	\$4,104.00
Sekowski, Michelle M.	Counsel	RFL	2005	\$675	147.2	\$685	1.3	N/A	0	N/A	0	\$100,250.50
Zimmer, Heather	Associate	RFL	2017	\$400	18.9	\$435	930.9	\$475	99.4	N/A	0	\$459,716.50
Field, Daniel	Associate	RFL	2017	N/A	0	\$435	186.2	\$475	13.6	N/A	0	\$87,457.00
Fromer, Gabrielle R.	Associate	RFL	2018	\$400	15.9	\$420	532.8	\$460	47.2	N/A	0	\$251,848.00
Plowman, Elizabeth J.	Associate	RFL	2018	N/A	0	\$420	619.0	\$460	27.9	N/A	0	\$272,814.00
Stockman, Silvia	Associate	RFL	2016	N/A	0	\$435	90.7	\$475	24.7	N/A	0	\$51,187.00

²⁸ Effective January 1, 2022.

Name of Professional	Position	Dep't ²⁴	Year Admitted	Hourly Billing Rate 2019	Total Hours Billed 2019	Hourly Billing Rate 2020	Total Hours Billed 2020	Hourly Billing Rate 2021	Total Hours Billed 2021	Hourly Billing Rate 2022	Total Hours Billed 2022	Total Compensation
Quigley, Rodger	Associate	RFL	2018	N/A	0	\$420	299.0	\$460	61.2	N/A	0	\$153,732.00
Veliky, Nicholas	Associate	RFL	2016	N/A	0	\$470	0.7	N/A	0	N/A	0	\$329.00
Anderson, Conor	Associate	RFL	2019	N/A	0	\$415	88.3	\$435	26.3	N/A	0	\$48,085.00
Calb, Michael	Associate	RFL	2014	N/A	0	\$540	28.4	N/A	0	N/A	0	\$15,336.00
Sheetz, Audrey	Associate	Litigation	2017	\$400	9.9	N/A	0	N/A	0	N/A	0	\$3,960.00
Austin, Maame	Associate	Litigation	2018	\$370	86.4	N/A	0	N/A	0	N/A	0	\$31,968.00
Poretsky, Larisa	Paralegal	RFL	N/A	\$360	132.4	\$390	95.5	\$410	48.7	\$455	9.5	\$109,198.50
Schepp, Linda	Paralegal	RFL	N/A	N/A	0	\$335	484.5	\$350	54.4	N/A	0	\$181,347.50

Name of Professional	Position	Dep't ²⁴	Year Admitted	Hourly Billing Rate 2019	Total Hours Billed 2019	Hourly Billing Rate 2020	Total Hours Billed 2020	Hourly Billing Rate 2021	Total Hours Billed 2021	Hourly Billing Rate 2022	Total Hours Billed 2022	Total Compensation
Hassall, Neil D.	Paralegal	Litigation	N/A	N/A	0	\$390	6.4	N/A	0	N/A	0	\$2,496.00
Kopf, Douglas	Managing Attorney	Managing Attorney	2016	N/A	0	\$410	2.0	N/A	0	N/A	0	\$820
Rosen, Nathan	Research Manager	Library and Research	N/A	N/A	0	\$320	1.0	N/A	0	N/A	0	\$320.00
Grillo, Allison	Research Assistant	Library and Research	N/A	N/A	0	\$250	1.5	N/A	0	N/A	0	\$375.00
DeLeon, Anthony	Litigation Support	Litigation Support	N/A	N/A	0	\$380	0.8	\$400	4.3	N/A	0	\$2,024.00
Almonte, Manuel	Litigation Support	Litigation Support	N/A	N/A	0	N/A	0	\$400	0.8	N/A	0	\$320.00
Cruz, Annabella A.	Court Clerk	Managing Attorney	N/A/	N/A	0	N/A	0	\$350	0.3	N/A	0	\$105.00
TOTAL FEES REQUESTED												\$3,910,104.00 ²⁹

²⁹ The total compensation reflects write offs and other voluntary reductions.

EXHIBIT D-1

**SUMMARY OF COMPENSATION BY TASK CODE AGAINST BUDGETED HOURS
AND FEES FOR THE EIGHTH INTERIM COMPENSATION PERIOD**

Task Code³⁰	Task Code Category	Hours Budgeted (Low – High)	Amount Budgeted (Low – High)	Actual Hours	Actual Amount
B160	Fee/Employment Applications	20 – 30	\$10,500 – \$15,500	9.9	\$5,410.50
B190	Contested Matters	40 – 60	\$35,000 – \$65,000	27.8	\$23,945.00
TOTAL		70 - 110	\$53,500 – \$96,500	37.7	\$29,355.50

³⁰ The fees related to task codes B160 and B190 are Herrick's fees attributable to the services it performs as counsel to the Creditors' Committee in connection with the Chapter 11 Cases, and such fees are paid out of the Debtors' carve-out account. Pursuant to the terms of the Plan and Confirmation Order, however, Herrick's fees and expenses attributable to the services it performs in connection with the Jointly Asserted Causes of Action are paid out of a segregated account established to provide initial funding for such litigation. *See* Confirmation Order ¶ 52(d). During the Compensation Period, Herrick incurred no fees and expenses related to the Jointly Asserted Causes of Action.

EXHIBIT D-2

**SUMMARY OF COMPENSATION BY TASK CODE FOR THE FINAL
COMPENSATION PERIOD**

Task Code³¹	Task Code Category	Actual Hours	Actual Amount
B110	Case Administration	174.9	\$78,666.00
B160	Fee/Employment Applications	415.5	\$218,436.00
B190	Contested Matters	1,640.0	\$1,086,656.00
	Jointly Asserted Causes of Action	4,818.4	\$2,526,345.50
TOTAL FEES REQUESTED		7,048.8	\$3,910,104.00

³¹ The fees related to task codes B160 and B190 are Herrick's fees attributable to the services it performs as counsel to the Creditors' Committee in connection with the Chapter 11 Cases, and such fees are paid out of the Debtors' carve-out account. Pursuant to the terms of the Plan and Confirmation Order, however, Herrick's fees and expenses attributable to the services it performs in connection with the Jointly Asserted Causes of Action are paid out of a segregated account established to provide initial funding for such litigation. *See* Confirmation Order ¶ 52(d). During the Compensation Period, Herrick incurred no fees and expenses related to the Jointly Asserted Causes of Action.

EXHIBIT E

DETAILED TIME RECORDS FOR THE FINAL COMPENSATION PERIOD



Simon Property Group, L.P.
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

June 5, 2019
Bill Number: 341824
File Number: 19609-0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through March 31, 2019	\$284,108.00
Expenses posted through March 31, 2019	3,179.77
TOTAL	\$287,287.77

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



Re: **Sears Bankruptcy**

Bill Number: 341824
File Number: 19609-0001
Page 2

LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
01/02/19	M. Sekowski	B120	Telephone conf. with S. O'Donnell and S. Smith re: case background and potential retention.	.40
01/02/19	M. Sekowski	B120	Review and analyze media reports and case materials re: pending dispute and potential investigation.	.40
01/02/19	M. Sekowski	B120	Research re: bid tampering case law.	.20
01/02/19	S. Selbst	B120	Begin reading of transcripts and pleadings re SRAC auction dispute.	2.20
01/02/19	S. Smith	B120	Initial review of Sears materials including pleadings and transcripts related to sale of MTNs.	2.00
01/02/19	S. Smith	B120	O/C with S. O'Donnell re possible new role serving as special litigation counsel to creditors' committee in Sears.	.50
01/03/19	M. Sekowski	B120	Review, analyze, and annotate miscellaneous materials re: MTN sale and objections to same.	4.70
01/03/19	S. Selbst	B120	Complete reading of transcripts and pleadings re SRAC auction dispute.	2.40
01/04/19	M. Sekowski	B120	Review correspondence from S. O' Donnell re: potential retention, January 2 hearing transcript and review of same.	.20



Re: **Sears Bankruptcy**

Bill Number: 341824
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01/04/19	S. Selbst	B120	Attention to January 2 transcript and related pleadings.	.80
01/04/19	S. Smith	B120	Follow up review of Sears pleadings.	1.00
01/05/19	M. Sekowski	B120	Review, analyze, and annotate January 2 hearing transcript.	1.30
01/06/19	M. Sekowski	B120	Review miscellaneous correspondence from S. O'Donnell, S. Brauner, and I. Dizengoff re: potential retention, discovery status.	.20
01/07/19	M. Sekowski	B120	Telephone conf. with S. O'Donnell, S. Selbst, and S. Smith re: case background, analysis and strategy, potential investigation, and preparation for call with UCC counsel.	.50
01/07/19	M. Sekowski	B120	Telephone conf. with S. Smith re: request for informal discovery.	.20
01/07/19	M. Sekowski	B120	Review correspondence from S. Smith and S. Brauner re: request for informal discovery and status of same.	.20
01/07/19	S. Selbst	B110	Catch up on recent pleadings.	.30
01/07/19	S. Selbst	B120	Meeting with S. O'Donnell re potential claims re Cyrus.	.80
01/07/19	S. Selbst	B120	Diligence background re status of Sears reorganization efforts.	.30



Re: **Sears Bankruptcy**

Bill Number: 341824
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01/07/19	S. Smith	B120	Prepare for and participate in O/C with S. O'Donnell, S. Selbst and M. Sekowski re prep for T/C with Akin Gump re Sears litigation.	2.00
01/07/19	S. Smith	B120	Sears: Follow up t/c with M. Sekowski and prepare and send out email to S. Brauner at Akin re discovery requests.	.20
01/07/19	S. Smith	B120	Review of Sears transcripts and pleadings and preparation of annotated time line.	4.50
01/08/19	L. Poretsky	B120	Sears: Upon conference with Stephen Selbst regarding contact person for HF bills search bankruptcy court docket for Simon Property Group, L.P. and Ron Tucker and circulate to the team.	.40
01/08/19	M. Sekowski	B120	Telephone conf. with S. Selbst re: case status.	.20
01/08/19	S. Selbst	B120	Prepare outline for discovery requests and discuss with S. O'Donnell.	1.00
01/08/19	S. Selbst	B120	Monitor hearing re auction process.	.50
01/08/19	S. Smith	B120	Sears: Participate telephonically in status conference before Judge Drain re Lampert's bid and status of auction, and prepare and circulate email report re same.	.30
01/08/19	S. Smith	B120	Sears: Prepare informal discovery requests and review and comment on S. Selbst's draft.	.80



Re: **Sears Bankruptcy**

Bill Number: 341824
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01/08/19	S. Smith	B120	Sears: Continued review of transcripts and pleadings, and prep of annotated time line.	4.50
01/09/19	M. Sekowski	B120	Review correspondence from S. O'Donnell re: deliverable obligations for SRAC auction.	.30
01/09/19	S. Smith	B120	Sears: Review ISDA entries re Sears/ISDA auction and submissions from Milbank and Shearman.	.50
01/10/19	D. King	B120	T/c O'Donnell re: MTN auction issues for UCC in Sears bankruptcy	.40
01/10/19	M. Sekowski	B120	Review and analyze draft 2004 motion and draft discovery requests.	.40
01/10/19	S. O'Donnell	B120	Confer w/ Akin re retention (.3); coordinate 2004 motion prep (.5); due diligence re same (2.8); confer re notice logistics (.3)	3.90
01/10/19	S. Selbst	B120	Check local rules and Judge Drain chamber rules re 2004 discovery.	.30
01/10/19	S. Selbst	B120	Discuss timing of serving discovery with S. O'Donnell.	.30
01/10/19	S. Selbst	B120	Conference call with Akin re scope of investigation.	.50
01/10/19	S. Smith	B190	Review of and revisions to (i) Draft Rule 2004 Motion, and (ii) Draft Document Requests to Cyrus, Barclays, Omega & Och-Ziff.	3.50
01/10/19	S. Smith	B120	Follow up O/C with S. O'Donnell re discovery and next steps.	.20



Re: **Sears Bankruptcy**

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01/10/19	S. Smith	B120	Sears: Prepare for and participate in T/C with S. O'Donnell, S. Selbst and Akin Gump team re conflicts role and next steps.	1.00
01/11/19	D. King	B120	Review motion materials, hearing transcripts re: MTN auction issues	6.20
01/11/19	L. Poretsky	B110	Assisting team in a preparation of 2004 Motion; review Judge Drain rules for filing 2004 Motions and proposed orders; draft and revise notice of hearing;	2.00
01/11/19	M. Sekowski	B190	Review and revise draft 2004 motion.	1.20
01/11/19	M. Sekowski	B190	Review submissions re: factual background for inclusion in 2004 motion.	1.10
01/11/19	M. Sekowski	B190	Attention to miscellaneous issues re: submission and filing of 2004 motion.	1.20
01/11/19	S. O'Donnell	B190	Review/revise 2004 motion; confer with client and team re same (4.2); prepare correspondence to court (.3)	4.50
01/11/19	S. Selbst	B120	Review and revise discovery requests to CDS participants.	.70
01/11/19	S. Selbst	B190	Review and revise motion for Rule 2004 examination.	.60
01/11/19	S. Selbst	B110	Coordinate filing of Rule 2004 motion with M. Sekowski.	.50



Re: **Sears Bankruptcy**

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01/11/19	S. Selbst	B110	Emails with S O'Donnell re procedure for filing ex parte Rule 2004 motion.	.40
01/11/19	S. Smith	B160	Preliminary preparation of Herrick Retention Application.	.80
01/11/19	S. Smith	B160	Follow up revisions to draft retention application.	.60
01/11/19	S. Smith	B190	Review of and revisions to Rule 2004 Motion and Document Requests for Cyrus, Barclays, Omega & Och-Ziff.	3.00
01/11/19	S. Smith	B190	O/C with S. Selbst re 2004 Motion and Document Requests.	.10
01/11/19	S. Smith	B190	Continued preparation of 2004/document requests and discussions with S. Selbst and S. O'Donnell re same.	1.00



Re: **Sears Bankruptcy**

Bill Number: 341824
File Number: 19609-0001
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01/12/19	L. Poretsky	B110	Phone conferences and exchange e-mails regarding strategy of filing of the 2004 Motion on a docket and submission to Judge Drain (.6); draft, revise and finalize notices of appearance for Sean O'Donnell, Stephen Selbst and Steven Smith and submit to Michelle Sekowski for review (1.4); prepare notices of appearance and 2004 motion for e-filing and file on a docket (1); download filed pleadings and submit to Michelle Sekowski for the service through Prime Clerk (.4); attention to team e-mail discussions regarding service of Chambers and Trustee's copies on Monday (.3); phone conferences re same (.3)	4.00
01/12/19	M. Sekowski	B190	Review and revise draft Rule 2004 motion, correspondence to court, and notices of appearance.	2.00
01/12/19	M. Sekowski	B190	Attention to submission and filing for Rule 2004 motion and correspondence to court.	1.70
01/12/19	S. O'Donnell	B190	Finalize 2004 motion and coordinate filing logistics; strategy and analysis	1.50
01/12/19	S. Smith	B190	Attention to email traffic re filing of 2004 motion.	.30



Re: **Sears Bankruptcy**

Bill Number: 341824
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01/13/19	M. Sekowski	B120	Review correspondence from S. O'Donnell, S. Selbst, and S. Smith re: case strategy, potential claims on behalf of committee, relevant case law.	.30
01/13/19	S. O'Donnell	B110	Strategy calls and emails.	.50
01/14/19	D. King	B120	Review case materials, info on credit default swaps	2.30
01/14/19	D. King	B120	Conference call with team	.50
01/14/19	D. King	B120	Follow up call with Selbst	.40
01/14/19	L. Poretsky	B110	Working with managing attorney to obtain/renew ECF credentials for Steven Smith (.4); Working with managing attorney to obtain/renew ECF credentials for Michelle Sekowski (.4); revise and finalize S. Smith notice of appearance and submit for review (.4); working with billing department to set up correct billing structure (.3)	1.50
01/14/19	M. Sekowski	B160	Review draft retention application.	.30
01/14/19	M. Sekowski	B190	Telephone conf. and correspondence with J. Mishkin re: objection to 2004 motion.	.20
01/14/19	M. Sekowski	B190	Review correspondence from court re: hearing on 2004 motion.	.20
01/14/19	M. Sekowski	B190	Conf. with S. O'Donnell re: response to correspondence from court.	.20
01/14/19	M. Sekowski	B190	Review draft discovery requests.	.30



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01/14/19	M. Sekowski	B190	Telephone conf. with S. O'Donnell, S. Smith, D. King and S. Selbst re: case strategy.	.30
01/14/19	M. Sekowski	B190	Miscellaneous correspondence with S. O'Donnell, S. Smith, and S. Selbst re: 2004 motion and status of same, case strategy.	.20
01/14/19	M. Sekowski	B120	Telephone confs. and correspondence with S. Smith re: informal discovery requests.	.20
01/14/19	M. Sekowski	B120	Telephone confs. and correspondence with S. Smith re: informal discovery requests.	.20
01/14/19	M. Sekowski	B120	Telephone conf. and correspondence with S. Brauner re: informal discovery requests.	.20
01/14/19	S. O'Donnell	B120	Sears: confer w/ Stroock re 2004 motion (.3); review and respond to court communication re notice for hearing (.1); coordinate same w/ team (.3); coordinate informal demands to CDS participants (.2); coordinate retention app (.2)	1.10
01/14/19	S. Selbst	B120	Conference call with Akin Gump re proposed discovery targets and coordination with auction process.	.30
01/14/19	S. Selbst	B120	Discuss legal theories of recovery with D. King.	.40
01/14/19	S. Selbst	B190	Review revised discovery request to CDS participants.	.30



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01/14/19	S. Selbst	B190	Conference call with S O'Donnell and Sears team re next steps on service of discovery and hearing on 2004 motion.	.50
01/14/19	S. Smith	B190	T/C with M. Sekowski re 2004 motion and discovery requests.	.20
01/14/19	S. Smith	B190	Prepare Notice of Hearing for Rule 2004 Motion.	.30
01/14/19	S. Smith	B190	Attention to and analysis re issues related to 2004 motion and document requests including calls with S. Brauner at Akin.	2.50
01/14/19	S. Smith	B190	Prepare and send out document requests to four CDS participants.	1.30
01/14/19	S. Smith	B160	Preparation of preliminary draft of Herrick Retention Application and supporting declarations and related exhibits.	3.50
01/14/19	S. Smith	B160	Discussions with L. Poretsky re preparation of retention application, supporting declarations and related exhibits.	.50
01/14/19	S. Smith	B110	T/C with S. Brauner at Akin re discovery and next steps.	.20
01/14/19	S. Smith	B410	T/C with team re (i) status of 2004 and document requests, (ii) case analysis, and (iii) next steps.	.50
01/14/19	S. Smith	B410	Follow up T/C with S. Selbst and D. King re case analysis and next steps.	.30



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01/15/19	D. King	B110	Follow up re: voluntary disclosure issues	.50
01/15/19	D. King	B110	Review research collected from Smith	.30
01/15/19	L. Poretsky	B110	Revise S. Smith Notice of Appearance per comments, finalize and e-file (.6); draft M. Sekowski Notice of Appearance and submit for review (.6); Finalize Notice of Hearing on 2004 Motion and e-file (.5); prepare service list (.6); prepare Notice and 2004 motion for service and serve accordingly (.8); prepare Chambers and Trustee copies and serve accordingly (.4)	3.50
01/15/19	L. Poretsky	B160	Retention application: Submit request to conflict department to obtain Schedule of Searched Parties (.2); review conflict search parties and forward to Steven Smith (.2)	.50
01/15/19	M. Sekowski	B160	Review correspondence from S. Smith re: draft notice of hearing.	.10
01/15/19	M. Sekowski	B110	Review and revise draft notice of appearance.	.20
01/15/19	S. O'Donnell	B120	Confer w/ Stroock re 2004 motion (.2); confer w/ team re same (.2)	.40
01/15/19	S. Selbst	B160	Attention to retention application.	.30



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01/15/19	S. Smith	B160	Continued preparation of, and attention to issues related to, (i) Herrick Retention Application, (ii) Declaration in Support of Retention, and (iii) search for conflicts.	3.00
01/15/19	S. Smith	B160	O/C with L. Poretsky re (i) preparation of Declaration in support of Herrick retention, and (ii) conducting conflict search.	.80
01/16/19	A. Sheetz	B190	Review and analyze all pleadings and client documents	2.60
01/16/19	A. Sheetz	B190	Review of client documents and analysis of potential claims in connection with Rule 2004 motion	1.20
01/16/19	A. Sheetz	B190	Legal research re potential claims in connection with 2004 motion	1.90
01/16/19	D. King	B120	Conference, emails with O'Donnell re: next steps	.50
01/16/19	D. King	B120	Emails with Smith re: voluntary disclosure responses	.40
01/16/19	L. Poretsky	B160	Assist Steven Smith with the preparation of the retention application by providing requested documents, general orders and UST Guidelines (.8); begin compile list of additional parties for conflict check (1.2)	2.00
01/16/19	M. Sekowski	B190	Telephone conf. with S. O'Donnell and A. Sheetz re: case background and strategy.	.40



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01/16/19	M. Sekowski	B190	Telephone conf. and correspondence with A. Sheetz re: background materials, legal research.	.40
01/16/19	S. O'Donnell	B120	Coordinate legal analysis (.5); conduct same (.5)	1.00
01/16/19	S. Smith	B160	Continued review of and revisions to Herrick Retention application, supporting declaration and schedules.	3.00
01/17/19	A. Sheetz	B190	Legal research and initial memo re potential claims in connection with 2004 motion	2.80
01/17/19	D. King	B110	Review filings, emails	.40
01/17/19	D. King	B190	Attention to research re: collusion, fraudulent conveyances, equitable subordination	1.00
01/17/19	D. King	B190	Emails re: collusion, fraudulent conveyances, equitable subordination	.30
01/17/19	D. King	B190	Coordinate research with Robinson	.20
01/17/19	L. Poretsky	B120	Revise, finalize and e-file Affidavit of Service of Notice of Hearing and 2004 Motion (.9); Finalize and e-file Michelle Sekowski Notice of Appearance (.4);	1.30



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01/17/19	L. Poretsky	B160	Continue to compile parties for conflict search, discuss options for submission large list of parties with the conflict department, organize accordingly and submit to conflicts department with instructions (1.4); oversee conflict search (.4); review and analyze conflict reports and forward to Steve Smith for review (1.0);	2.80
01/17/19	M. Sekowski	B120	Review and analyze correspondence from A. Sheetz re: collusive bidding research.	.30
01/17/19	M. Sekowski	B120	Correspondence with D. King re: same.	.20
01/17/19	S. O'Donnell	B120	Bid rigging analysis	1.00
01/17/19	S. Selbst	B160	Review of retention application.	.30
01/17/19	S. Selbst	B160	Discuss disclosure of prior Sears representation with S. Smith.	.20
01/17/19	S. Smith	B160	Continued preparation of, and attention to conflict issues relating to, the supporting retention declaration.	1.50
01/18/19	D. King	B190	Review emails re: ESL bid, responses to informal discovery request	.30



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01/18/19	L. Poretsky	B160	Oversee conflict search and provide assistance (.8); assist Steven Smith with preparation of the retention application (.6); conference with billing department to confirm attorneys and others 2019 billing rates (.3)	1.70
01/18/19	M. Sekowski	B120	Review correspondence from S. Smith re: hearing summary; review correspondence from E. Merkel re: discovery requests to Omega Advisors.	.30
01/18/19	S. O'Donnell	B190	Sears: confer w/ team re hearing (.2); review summary of same (.2); strategy and analysis (.2)	.60
01/18/19	S. Smith	B160	Continued review of results of conflict search and revise supporting retention declaration accordingly.	1.00
01/18/19	S. Smith	B160	Continued revisions to supporting retention declarations.	.50
01/18/19	S. Smith	B410	Participate telephonically in the status conference held in Court regarding the auction, sale and next steps.	.50
01/22/19	L. Poretsky	B160	Follow up on a status of the conflict check (.2); Oversee conflict search and provide assistance (.4);	.60
01/22/19	S. Smith	B160	Continued review of and revisions to draft retention papers, including review of Revised UST Guidelines.	1.50



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01/22/19	S. Smith	B160	Discussions with L. Poretsky (paralegal) and conflicts team in preparation of declaration in support of retention.	.40
01/23/19	L. Poretsky	B160	Follow up on a status of the conflict check; discuss with David Small same;	.40
01/23/19	S. Smith	B160	Continued preparation of retention papers and review of results of conflict check.	1.00
01/24/19	L. Poretsky	B160	Continue working on a schedules to the Sean O'Donnell' affidavit re HF retention application	1.50
01/24/19	S. Smith	B160	Coordinate review of conflicts with L. Poretsky (paralegal) and conflicts team in preparation of declaration in support of preparation.	1.30
01/25/19	S. Smith	B190	Review Motion for approve of sale and updated APA for releases to any CDS participants.	.50
01/25/19	S. Smith	B160	Continued review of and revisions to Declaration in support of retention including review of updated results of conflict search.	2.00
01/26/19	S. O'Donnell	B120	F/up re 2004 motion; confer w/ team re same	.20
01/26/19	S. Smith	B190	Exchange emails with S. O'Donnell and S. Selbst re status of 2004 requests, and timing of opposition/reply papers.	.20



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01/28/19	A. Sheetz	B190	Legal research and analysis of potential claims in connection with 2004 motion	.50
01/28/19	L. Poretsky	B160	Review and analyze results of the conflict search related to the HF retention application (.9); update schedules to Sean O'Donnell's declaration (1.5); prepare list of additional parties for conflict search and submit to conflict department (.6); update schedule of searched parties and proofread schedule 1 and cross reference with the parties searched to insure correct names and categories;	3.50
01/28/19	S. O'Donnell	B120	Coordinate analysis and f/up.	.50
01/28/19	S. Smith	B160	Continued coordination of conflict search for declaration in support of retention and review results of search.	.70
01/29/19	L. Poretsky	B160	Review and analyze results of additional conflict search related to the HF retention application (.4); update schedules to Sean O'Donnell's declaration (.6); submit to conflict department additional parties per Steve Smith request (.4); review and analyze results of additional conflict search related to the HF retention application (.4) review Judge Drain, bankruptcy court and local rules re service of notice of hearing on retention application (.5)	2.30



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01/29/19	S. Smith	B160	Prepare retention papers for review by Akin and the committee.	1.50
01/30/19	L. Poretsky	B160	Conference with Michelle Sekowski to discuss service of HF Retention Application through Prime Clerk and obtain contact information;	.40
01/30/19	M. Sekowski	B160	Correspondence with L. Poretsky re: service of retention application.	.10
01/30/19	S. Selbst	B160	Review retention application and discuss with S. Smith.	.40
01/30/19	S. Smith	B160	Finalize draft retention papers for committee review.	.90
01/30/19	S. Smith	B160	T/C with S. Selbst re edits to retention papers.	.10
01/30/19	S. Smith	B160	Exchange emails with S. Brauner at Akin re coordinating committee review of draft retention papers.	.10
01/31/19	S. Smith	B160	(i) T/C with S. Brauner at Akin re committee review of Herrick retention papers and (ii) revise papers.	.50
02/01/19	A. Sheetz	B410	Legal analysis in connection with potential claims	.60
02/01/19	D. King	B170	Review filings, emails; coordinate research w/ Robinson	.60
02/01/19	M. Sekowski	B120	Review correspondence from S. O'Donnell re: reply to UCC's objection, Cyrus release.	.20



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02/01/19	M. Sekowski	B120	Review and analyze reply to UCC's objection and draft correspondence to S. O'Donnell re: same.	.80
02/01/19	M. Sekowski	B120	Correspondence with S. Brauner re: UCC objection and issues related to same.	.20
02/01/19	M. Sekowski	B120	Correspondence with S. Smith and A. Sheetz re: UCC objection.	.10
02/01/19	S. O'Donnell	B120	Coordinate team analysis (.3); review sub comm reply to UCC objection re MTN and Cyrus release matters (.2).	.50
02/01/19	S. Smith	B190	Research potential estate claims and causes of action arising out of MTN investigation in preparation for hearing on Rule 2004 motion.	2.50
02/01/19	S. Smith	B190	Review of case law regarding potential claims and causes of action in preparation for Rule 2004 hearing.	1.50
02/01/19	S. Smith	B190	Prepare outline of potential claims and causes of action based upon review of case law.	.50
02/02/19	S. Smith	B190	Attention to and review of emails regarding Debtors' and Committee's sale motion pleadings as it relates to a release for Cyrus and pending Rule 2004 Motion.	.30
02/03/19	S. Smith	B190	Review APA, Sale Motion, and draft Sale Order re Cyrus Release.	.80



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02/04/19	A. Sheetz	B410	Correspondence and research regarding Cyrus release	.30
02/04/19	M. Sekowski	B120	Review correspondence from S. Smith re: reply to UCC's objection, Cyrus release.	.20
02/04/19	S. Selbst	B160	Discuss retention issues with S. Smith.	.20
02/04/19	S. Selbst	B190	Discuss 2004 issues with S. Smith.	.20
02/04/19	S. Smith	B190	Participate telephonically in hearing re the Sale Motion specifically for the opening remarks regarding the release language included in the APA and Sale Order.	.50
02/04/19	S. Smith	B190	Prepare and circulate email update to team re release language in APA and Sale Order.	.20
02/04/19	S. Smith	B190	Review APA and latest draft of Sale Order for issues related to Cyrus Release as it relates to the MTN Investigation of the CDS Participants.	.50
02/04/19	S. Smith	B190	Conduct research re potential causes of action against CDS participants in preparation for upcoming hearing on Rule 2004 motion.	1.00
02/04/19	S. Smith	B190	O/C with S. Selbst and T/C with D. King re potential causes of action against CDS participants.	.30
02/05/19	D. King	B170	Conf. call re: next steps	.30



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02/05/19	H. Robinson	B190	Calls with D. King and M. Sekowski for case background ahead of legal research relating to causes of action.	.60
02/05/19	M. Sekowski	B120	Review and analyze UCC objection to sale.	1.00
02/05/19	M. Sekowski	B120	Miscellaneous correspondence and telephone conf. with S. O'Donnell, S. Smith, and D. King re: Cyrus objection proposal, objection deadline and research status.	.70
02/05/19	M. Sekowski	B120	Telephone conf. with H. Robinson re: case background and research.	.50
02/05/19	M. Sekowski	B120	Telephone call to S. Brauner re: Cyrus proposal and response to same.	.10
02/05/19	M. Sekowski	B120	Correspondence with S. Smith re: Cyrus proposal and response to same.	.20
02/05/19	S. O'Donnell	B410	Coordinate claim analysis (.3); coordinate resolution w/ Cyrus re 2004 motion (.3); call w/ milbank re same (.3)	.90
02/05/19	S. Selbst	B190	Attention to transcripts of December and January hearings re MTN auction (0.5),	.50
02/05/19	S. Selbst	B410	Attention to proposal from Cyrus (0.3).	.30
02/05/19	S. Smith	B190	T/C with Herrick Team re proposal from Cyrus for consensual discovery.	.40



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02/05/19	S. Smith	B190	T/C with M. Sekowski re Cyrus proposal and follow up call to Akin re same.	.30
02/05/19	S. Smith	B190	Continued research for potential estate claims and causes of action relating to the MTN investigation and upcoming hearing on Rule 2004 motion.	1.50
02/06/19	M. Sekowski	B120	Correspondence and telephone conf. with S. Brauner re: Cyrus proposal and response to same.	.40
02/06/19	M. Sekowski	B120	Miscellaneous correspondence and telephone confs. with S. O'Donnell and S. Smith re: Cyrus objection proposal.	.90
02/06/19	M. Sekowski	B120	Telephone conf. and correspondence with S. O'Donnell and K. Pasquale re: Omega and Och-Ziff objection proposal.	.30
02/06/19	M. Sekowski	B120	Telephone conf. with S. Smith and K. Pierucci re: Cyrus objection proposal.	.30
02/06/19	M. Sekowski	B120	Correspondence with S. O'Donnell, S. Selbst, D. King, S. Smith, and H. Robinson re: research and analysis status	.30
02/06/19	M. Sekowski	B120	Review correspondence from S. Smith re: hearing testimony on Cyrus release.	.30
02/06/19	S. O'Donnell	B410	Confer w/ stroock re 2004 motion (.3); confer w/ team re same (.2)	.50



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02/06/19	S. Selbst	B190	Review correspondence from Cyrus re 2004 motion (0.2).	.20
02/06/19	S. Selbst	B190	Discuss scope of investigation and potential claims from investigation with M. Sekowski (0.3).	.30
02/06/19	S. Smith	B190	Research potential estate claims and causes of action in preparation for hearing on Rule 2004 motion.	1.50
02/06/19	S. Smith	B190	Attention to and discussions regarding discovery proposals Cyrus, Omega & Och-Ziff.	1.00
02/07/19	D. King	B170	Review emails re: sale approvals/2004 objections	.50
02/07/19	M. Sekowski	B120	Review and analyze Cyrus, Omega, and Och-Ziff's objections to 2004 motion.	1.00
02/07/19	M. Sekowski	B120	Telephone conf. with S. Smith re: objections to 2004 motion and reply on same.	.30
02/07/19	M. Sekowski	B120	Review correspondence from S. Smith re: closing arguments on Cyrus release, sale order.	.20
02/07/19	M. Sekowski	B120	Review correspondence from S. Brauner re: Cyrus objection and timing issue.	.20
02/07/19	M. Sekowski	B120	Telephone confs. and correspondence with S. O'Donnell re: Cyrus objection and timing issue.	.80



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02/07/19	M. Sekowski	B120	Telephone conf. and miscellaneous correspondence with S. O'Donnell, S. Smith, and K. Pierucci re: Cyrus objection and revisions to same.	.60
02/07/19	S. O'Donnell	B410	Confer w/ team re 2004 motion (.2); confer with Milbank re same (.2); review/comment on draft objection (.2); coordinate replies (.1)	.70
02/07/19	S. Selbst	B190	Review objections to 2004 motion.	.60
02/07/19	S. Smith	B190	T/C with S. O'Donnell and counsel for Cyrus.	.50
02/07/19	S. Smith	B190	Review of responses and objections to 2004 motion filed by Cyrus, Omega and Och-Ziff in preparation for reply.	2.50
02/07/19	S. Smith	B190	Participate telephonically in final day of contested hearing on sale motion for the sole purpose of listening for comments to Cyrus release.	.50
02/08/19	H. Robinson	B190	Call with S. Smith and S. Selbst regarding motion papers and legal research in support of discovery.	.50
02/08/19	H. Robinson	B190	Performed legal research in support of discovery and supplied email memos on various topics.	2.60
02/08/19	L. Poretsky	B110	Hearing prep: Preapre 2 binders of the documents related to HF 2004 Motion per Sean O'Donnell request; daft index of documents	.80



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02/08/19	M. Sekowski	B120	Telephone conf. with S. O'Donnell re: reply brief on 2004 motion.	.20
02/08/19	M. Sekowski	B120	Telephone confs. with H. Robinson re: legal research.	.30
02/08/19	M. Sekowski	B120	Legal research re: oral examinations in 2004 discovery.	1.30
02/08/19	M. Sekowski	B120	Review legal research results from H. Robinson.	.40
02/08/19	M. Sekowski	B190	Miscellaneous correspondence with S. Smith, S. O'Donnell and H. Robinson re: outline of reply brief on 2004 motion, legal research.	.50
02/08/19	S. O'Donnell	B410	Review objections (.5); confer w/ team re same and coordinate reply (.5); legal analysis re potential claims (.5)	1.50
02/08/19	S. Selbst	B190	Conference S. O'Donnell re responses to 2004 motion (0.9).	.90
02/08/19	S. Selbst	B190	Discuss 2004 research issues for response brief with H. Robinson.	.30
02/08/19	S. Selbst	B190	Outline of response on 2004 brief.	.60
02/08/19	S. Smith	B190	Prepare outline for omnibus reply to 2004 objections.	.80
02/08/19	S. Smith	B190	O/C with S. O'Donnell and S. Selbst re 2004 objections and preparation of reply.	1.00
02/08/19	S. Smith	B190	O/C with S. Selbst re scope of discovery requests and preparation of 2004 objections.	.80
02/08/19	S. Smith	B190	Prepare reply to 2004 objections.	2.00



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02/08/19	S. Smith	B190	Review research for reply to 2004 objections.	1.50
02/09/19	H. Robinson	B190	Completed research in support of reply on discovery motion and supplied email memo regarding same.	.60
02/09/19	M. Sekowski	B120	Review additional legal research results from H. Robinson.	.30
02/09/19	S. Selbst	B190	Complete first draft of 2004 response and send to S. Smith.	5.50
02/09/19	S. Smith	B190	Review of and revisions to draft omnibus reply to 2004 objections.	5.00
02/10/19	M. Sekowski	B120	Telephone conf. with H. Robinson re: legal research, reply brief.	.30
02/10/19	S. O'Donnell	B410	Review/revise reply brief	.80
02/10/19	S. Selbst	B190	Review S. Smith revisions to 2004 response and send comments.	.70
02/10/19	S. Smith	B190	Finalize draft reply to 2004 objections and circulate to team.	2.00
02/11/19	D. King	B190	Review creditor filings, conf. w/ Robinson re: research on claims against hedge funds	.30
02/11/19	H. Robinson	B190	Legal research and report regarding possible causes of action.	1.60
02/11/19	L. Poretsky	B160	Per Steve Smith request conference with accounting department to confirm 2019 hourly billable rates provided early for the purpose of HF retention application	.30



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02/11/19	L. Poretsky	B110	Prepare for filing, e-file HF reply to the objections to our Rule 2004 motion (.4); prepare for service and serve upon parties (.5); prepare Chambers copy and arrange federal express delivery (.4)	1.30
02/11/19	M. Sekowski	B120	Review, analyze, and revise draft reply brief.	.60
02/11/19	M. Sekowski	B120	Miscellaneous correspondence with S. O'Donnell and S. Smith re: draft reply brief and revisions to same.	.30
02/11/19	M. Sekowski	B120	Telephone conf. with S. O'Donnell re: meet and confer with CDS participants' counsel, finalization and filing of reply brief.	.30
02/11/19	M. Sekowski	B120	Telephone confs. and correspondence with S. Smith re: meet and confer with CDS participants' counsel.	.70
02/11/19	M. Sekowski	B120	Miscellaneous correspondence with Quinn, Stroock, and Milbank re: meet and confer over scope of discovery.	.50
02/11/19	M. Sekowski	B120	Correspondence with S. O'Donnell and S. Smith re: retention application.	.20
02/11/19	M. Sekowski	B120	Telephone confs. with H. Robinson re: factual background and potential causes of action.	.40
02/11/19	S. O'Donnell	B410	Review/revise reply brief (4); prep for hearing (.5)	4.50
02/11/19	S. Selbst	B190	Final edits to response brief.	.80



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02/11/19	S. Smith	B160	Revise draft retention papers per preliminary comments received from Akin Gump.	.30
02/11/19	S. Smith	B160	Review preliminary comments from Akin Gump re draft Herrick retention papers.	.50
02/11/19	S. Smith	B190	Continued review of and revision to draft omnibus reply per t/c with S. O'Donnell.	1.00
02/11/19	S. Smith	B190	T/C with S. O'Donnell re revisions to draft omnibus reply to objections to 2004 motion.	.20
02/11/19	S. Smith	B190	Work with O'Donnell and team to finalize omnibus reply to 2004 objections and coordinate filing of same.	2.80
02/11/19	S. Smith	B190	T/C with M. Sekowski re scheduling meet & confer conferences with each of the CDS participants and exchange emails with counsel for CDS participants re same.	.70
02/11/19	S. Smith	B190	Review research re collusion and related claims in preparation of outline for hearing on 2004 motion.	1.20
02/11/19	S. Smith	B190	Prepare outline overview for contested hearing on 2004 Motion.	1.00
02/12/19	D. King	B190	Conf. w/ Robinson to discuss research	.20
02/12/19	H. Robinson	B190	Completed legal research and sent second report regarding potential causes of action.	1.30



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02/12/19	L. Poretsky	B160	Working with Steven Smith on HF retention application and exhibits	1.30
02/12/19	L. Poretsky	B110	Hearing preparation: organize documents in the order specified in the index; submit for printing and request to arrange in two binders, pouch one to Newark Office attn: Michelle Sekowski;	.60
02/12/19	M. Sekowski	B120	Telephone conf. with S. O'Donnell and S. Smith re: meet and confer preparation.	.30
02/12/19	M. Sekowski	B120	Telephone conf. and correspondence with Stroock and Quinn re: scope of discovery requests.	.40
02/12/19	M. Sekowski	B120	Review and analyze correspondence from H. Robinson re: potential causes of action.	.30
02/12/19	M. Sekowski	B120	Telephone confs. and correspondence with S. Smith re: preparation for oral argument on Rule 2004 motion.	.60
02/12/19	M. Sekowski	B120	Attention to preparation of materials for oral argument on Rule 2004 motion.	1.00
02/12/19	M. Sekowski	B120	Correspondence with S. Smith and K. Pierucci re: Milbank discovery proposal.	.40
02/12/19	M. Sekowski	B120	Review and analyze draft outline for 2004 argument.	.30



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02/12/19	M. Sekowski	B120	Correspondence with S. Smith re: revisions to draft outline for 2004 argument.	.20
02/12/19	M. Sekowski	B120	Correspondence with S. O'Donnell and S. Smith re: meet and confer confs. and strategy for same, narrowing of discovery scope and timeframe.	.40
02/12/19	S. O'Donnell	B410	Prep and participate in meet and confer call (.8); f/up calls/emails re same (.3); calls/emails re settlement negotiations for 2004 motion (.5)	1.60
02/12/19	S. Selbst	B160	Final revisions to retention application and sign application.	.40
02/12/19	S. Smith	B160	Finalize retention papers for filing.	2.00
02/12/19	S. Smith	B160	Coordinate Committee review of retention application with S. Brauner at Akin and review comments from R. Tucker, Committee Chair.	.50
02/12/19	S. Smith	B190	Prepare for and conduct "meet & confer" conferences with counsel for CDS Participants in advance of hearing on 2004 Motion.	1.50
02/12/19	S. Smith	B190	Discussions with M. Sekowski re preparation for hearing on Rule 2004 motion.	.80
02/12/19	S. Smith	B190	Continued prep of hearing outline, including analysis of potential estate claims.	1.50



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02/12/19	S. Smith	B190	Prepare hearing outline for S. O'Donnell including overview of potential claims and causes of action.	3.50
02/13/19	L. Poretsky	B160	Revise, update, assemble exhibits, finalize Herrick Feinstein Retention Application (1.0); prepare for filing and e-file (.4); prepare Chambers copy (.3); submit filed application to Prime Clerk for service (.3);	2.00
02/13/19	L. Poretsky	B110	Drfat, revise, finalize and file on a docket Affidavit of Service of Omnibus Reply to Objections	.80
02/13/19	L. Poretsky	B110	Hearing preparation: finalize binder for Sean O'Donnell and investigate issues with Michelle Sekowski's binder	.80
02/13/19	M. Sekowski	B120	Review and revise oral argument outline for Rule 2004 motion	1.00
02/13/19	M. Sekowski	B120	Correspondence with S. O'Donnell re: outline for oral argument on Rule 2004 motion.	.90
02/13/19	M. Sekowski	B120	Telephone confs. and correspondence with S. Smith re: preparation for oral argument on Rule 2004 motion, draft order.	.80
02/13/19	M. Sekowski	B120	Miscellaneous telephone confs. and correspondence with Stroock, Quinn and Milbank re: agreement on scope and timing of discovery, text of proposed order.	1.00



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02/13/19	S. O'Donnell	B410	Calls/emails re 2004 motion settlement (.8); confer w/ Team re same (.3); hearing prep (1); review/revise proposed order and settlement terms (.5); finalize terms (.3)	2.90
02/13/19	S. Selbst	B160	Telephone conference US Trustee re retention application.	.20
02/13/19	S. Selbst	B160	Revise application and re-file order.	.30
02/13/19	S. Selbst	B190	Attention to comments on 2004 order and scope of discovery.	1.20
02/13/19	S. Smith	B160	Follow up re question raised by US Trustee regarding Declaration in support of Herrick Retention and Proposed Order.	.50
02/13/19	S. Smith	B190	Discussions with Weil and Akin re proposed resolution of contested 2004 motion.	.30
02/13/19	S. Smith	B190	Herrick team discussions re (i) preparation for 2004 hearing, (ii) meet & confer issues, and (iii) responses to counsel for CDS Participants.	2.50
02/13/19	S. Smith	B190	Continued preparation for 2004 hearing, including (i) responding to comments from counsel for CDS participants, (ii) review of motion, objections and reply, and (iii) review of outline and cases cited therein re potential estate claims.	2.50



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02/13/19	S. Smith	B190	Continued meet & confer discussions with counsel for Cyrus, OCO and Och-Ziff to negotiate a consensual resolution to Committee' Rule 2004 motion.	2.50
02/13/19	S. Smith	B190	Negotiate consensual order with counsel for CDS Participants to approve 2004 Motion including reviewing drafts of the order and discussions with counsel re same.	1.50
02/13/19	S. Smith	B190	Review of and revisions to draft hearing outline, including overview of estate claims and causes of action.	1.50
02/14/19	M. Sekowski	B120	Draft correspondence to Stroock, Quinn, and Milbank re: notification to court of motion on consent.	.20
02/14/19	M. Sekowski	B120	Correspondence and telephone confs. with S. Smith re: preparation for and outcome of oral argument on Rule 2004 motion.	.60
02/14/19	M. Sekowski	B120	Telephone conf. with S. O'Donnell re: outcome of Rule 2004 motion.	.20
02/14/19	M. Sekowski	B120	Draft correspondence to Court re: proposed order granting Rule 2004 motion.	.30
02/14/19	S. O'Donnell	B410	Prepare for hearing and confer with Akin re: same; travel to and attend same; return to NYC.	4.80
02/14/19	S. Selbst	B160	Further discussion of Herrick retention with P. Schwartzberg of US Trustee office.	.20



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02/14/19	S. Smith	B160	Exchange emails with P. Schwartzberg at the US Trustee's office regarding comments to Herrick retention application and order and review order re same.	.30
02/14/19	S. Smith	B190	Prepare for, travel to/from, and attend hearing on Committee's motion for 2004 relief.	2.00
02/14/19	S. Smith	B190	T/C with M. Sekowski re status and prep and submission of proposed order to chambers.	.20
02/14/19	S. Smith	B190	Follow up research and analysis of potential estate claims and causes of action arising out of conduct of CDS participants.	2.00
02/15/19	D. King	B190	Emails w/ Robinson re: status	.20
02/15/19	L. Poretsky	B110	Conference with Steve Smith re service of retention application; assist with 2004 subpoenas	.70
02/15/19	M. Sekowski	B120	Correspondence with S. Smith re: status of subpoenas and document demands.	.20
02/15/19	S. O'Donnell	B410	Coordinate discovery.	.50
02/15/19	S. Smith	B160	Continued follow up re Herrick retention papers per request of US Trustee.	.80
02/15/19	S. Smith	B190	Attention to issues related to 2004 subpoenas.	.50
02/19/19	D. Kopf	B110	Procedural Advice - Federal re: service of subpoenas in bankruptcy proceedings.	.30



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02/19/19	L. Poretsky	B110	Research bankruptcy court forms re Rule 2004 subpoena for document production (.3); review and analyze bankruptcy rule re service of subpoena (.4); conference with Steve Smith re same (.4)	1.10
02/19/19	M. Sekowski	B120	Review and analyze correspondence from K. Pasquale re: proposed search terms for OCO and Och-Ziff ESI searches.	.20
02/19/19	M. Sekowski	B120	Correspondence with S. Smith and S. O'Donnell re: search terms for OCO and Och-Ziff ESI searches.	.20
02/19/19	S. Smith	B190	Revise discovery requests to conform with 2004 order and prepare related Subpoenas.	2.00
02/19/19	S. Smith	B190	Review proposed search terms from counsel for Omega and Och-Ziff and discussions with team re same.	.50
02/19/19	S. Smith	B190	Follow up email to Herrick team re proposed search terms.	.30
02/20/19	M. Sekowski	B120	Miscellaneous telephone confs. and correspondence with S. Smith re: 2004 subpoenas and search terms.	.80
02/20/19	M. Sekowski	B120	Review, analyze, and revise draft subpoenas to CDS participants.	1.00
02/20/19	M. Sekowski	B120	Review, analyze, and revise search terms proposed by OCO and Och-Ziff.	.90



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02/20/19	M. Sekowski	B120	Correspondence with S. O'Donnell and S. Smith re: draft 2004 subpoenas and ESI search terms.	.20
02/20/19	M. Sekowski	B120	Review and analyze S. O'Donnell's comments to draft 2004 subpoenas and correspondence with S. Smith re: incorporation of same.	.30
02/20/19	S. O'Donnell	B410	Review/revise discovery demands; confer re search terms; coordinate discovery; case admin	1.00
02/20/19	S. Smith	B160	Follow up with P. Schwartzberg of the Office of the United States Trustee re supplemental declaration and discussions with billing team re same.	.50
02/20/19	S. Smith	B160	Prepare and circulate draft supplemental declaration in support of Herrick retention per direction from Office of the United States Trustee.	.80
02/20/19	S. Smith	B190	Revise document requests, 2004 subpoenas and protective order.	2.50
02/20/19	S. Smith	B190	T/C with M. Sekowski re revisions to draft document requests and list of proposed search terms.	.30
02/20/19	S. Smith	B190	Follow up preparation of subpoenas for document production.	1.30
02/20/19	S. Smith	B190	Follow up review of and discussions regarding draft list of proposed search terms for discovery.	.80



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02/21/19	L. Poretsky	B160	Prepare for filing and file on a docket First Supplemental Declaration of Stephen Selbst in Support of Retainer Application (.6); assemble correct PDF of the Retainer Application and conference with court re substitution of the wrongly attached PDF with correct one (.4)	1.10
02/21/19	M. Sekowski	B120	Review and analyze revised subpoenas to CDS participants.	.40
02/21/19	M. Sekowski	B120	Miscellaneous correspondence and telephone confs. with S. Smith re: revised subpoenas to CDS participants, search terms.	.60
02/21/19	S. Selbst	B160	Revise and sign amended declaration for Herrick retention.	.30
02/21/19	S. Smith	B190	Review of and revisions to draft list of proposed search terms and circulate to counsel for CDS participants.	.80
02/21/19	S. Smith	B190	Review of and revisions to draft document requests and circulate same.	.90
02/22/19	S. O'Donnell	B410	Coordinate discovery	.50
02/22/19	S. Smith	B190	Revise list is of proposed search terms, subpoenas and document requests.	.80
02/23/19	S. Smith	B190	Attention to email traffic from counsel for CDS participants regarding search terms and review of same.	.30



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02/24/19	S. Smith	B190	Review list of proposed search term sent from counsel for Cyrus and exchange emails with Herrick team re same.	.30
02/25/19	M. Sekowski	B120	Correspondence and telephone confs. with S. Smith re: subpoena status and search terms.	.30
02/25/19	M. Sekowski	B120	Review and analyze search terms proposed by counsel for Cyrus and revise search term list.	1.10
02/25/19	M. Sekowski	B120	Draft correspondence to K. Pierucci i re: revised search term list.	.20
02/25/19	S. Smith	B160	O/C with L. Poretsky re service of retention application and supplemental declaration.	.20
02/25/19	S. Smith	B190	Follow up email with M. Sekowski re status of negotiation of list of proposed search terms.	.20
02/25/19	S. Smith	B190	T/C with M. Sekowski re (i) negotiation of list of search terms with counsel for CDS participants, and (ii) preparation of subpoenas and document requests for service to CDS participants.	.20
02/26/19	L. Poretsky	B160	Prepare Herrick Feinstein's retention application and supplemental declaration of S. Selbst for service and submit to Prime clerk for service.	.60



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02/26/19	M. Sekowski	B120	Telephone conf. and correspondence with D. Eggerman re: subpoena to and search terms for Barclays.	.50
02/26/19	M. Sekowski	B120	Correspondence with K. Pasquale and A. Corkhill re: agreement to search terms for OCO and Och-Ziff.	.30
02/26/19	M. Sekowski	B120	Miscellaneous correspondence and telephone confs. with S. Smith re: search term and subpoena issues, case management and strategy.	1.00
02/26/19	M. Sekowski	B120	Correspondence and telephone conf. with Milbank re: search terms for Cyrus.	.50
02/26/19	M. Sekowski	B120	Attention to QC and finalization of subpoenas to OCO, Och-Ziff, and Barclays.	.80
02/26/19	S. Smith	B190	Prepare and send follow up email to counsel for OCO and Och-Ziff regarding list of proposed search terms.	.10
02/26/19	S. Smith	B190	Reach agreement with counsel for OCO and Och-Ziff re list of search terms and exchange emails re same and subpoenas.	.50
02/26/19	S. Smith	B190	Finalize agreement on search terms with counsel for CDS participants and finalize and issue subpoenas and documents requests.	3.50



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02/26/19	S. Smith	B190	Continued discussions with counsel for CDS participants re search terms and service of subpoenas.	.50
02/26/19	S. Smith	B190	T/C with M. Sekowski re edits to subpoena and document requests and service of same.	.50
02/26/19	S. Smith	B160	Coordinate service of retention application and supplemental declaration and O/C with L. Poretsky, paralegal, re same.	.30
02/27/19	L. Poretsky	B110	Conference with Michelle Sekowski regarding case administration; Prepare binder of documents related to the 2004 Motion and submit to Maami Austin; calendar upcoming court appearances and submit to managing attorney to add to the tickler report;	1.00
02/27/19	M. Austin	B110	Discussion with M. Sekowski re expectations for Sears bankruptcy case	.50
02/27/19	M. Sekowski	B120	Telephone conf. with S. O'Donnell re: subpoena status and strategy issues.	.20
02/27/19	M. Sekowski	B120	Telephone conf. with A. Austin re: case background and strategy, docket and motion issues.	.50
02/27/19	M. Sekowski	B120	Telephone confs. with L. Poretzky re: motion issues.	.30



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02/27/19	M. Sekowski	B120	Telephone confs. and correspondence with S. Smith re: subpoena status and strategy issues.	.30
02/27/19	M. Sekowski	B120	Review correspondence from A. Corkhill and S. Smith re: subpoena to OCO.	.20
02/27/19	S. O'Donnell	B410	Confer w/ MS re subpoenas	.20
02/27/19	S. Smith	B190	Attention to request from counsel for CDS participant to reissue subpoena and analysis re same.	.80
02/28/19	M. Austin	B110	Discussion with MAO re e-alerts for pacer filings in SEARS investigation matter;	.40
02/28/19	M. Sekowski	B120	Telephone conf. and correspondence with S. Smith and S. O'Donnell re: subpoena to OCO and issues related to same.	.30
02/28/19	M. Sekowski	B120	Review and analyze revised subpoena to OCO.	.20
02/28/19	S. Smith	B190	Discussions with S. O'Donnell and M. Sekowski re revising subpoena and document requests.	.40
02/28/19	S. Smith	B190	Follow up with counsel for OCO Capital Partners per request of counsel to reissue subpoena.	.80
02/28/19	S. Smith	B190	Revise Omega subpoena and document requests per request from counsel for OCO and discussion with team re same.	2.00



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03/01/19	M. Sekowski	B120	Miscellaneous correspondence with S. Smith and K. Pierucci re: search terms for Cyrus.	.20
03/01/19	S. Smith	B190	Review of list of search terms for Cyrus Capital and follow up with counsel for Cyrus re same.	.50
03/01/19	S. Smith	B190	Follow up review of protective order for CDS participants per Rule 2004 Order.	.50
03/04/19	M. Austin	B110	Set up of SDNY e-mail filings; review of same	.30
03/04/19	M. Sekowski	B120	Telephone conf. with S. Smith re: Cyrus and Barclays search terms.	.30
03/04/19	M. Sekowski	B120	Telephone conf. with S. Smith and K. Pierucci re: Cyrus search terms.	.20
03/04/19	M. Sekowski	B120	Review and analyze draft subpoena to Cyrus and correspondence with S. Smith re: same.	.30
03/04/19	S. Smith	B190	Prepare for and host T/C with counsel for Cyrus Capital Partners regarding negotiation of list of search terms for document production.	.50
03/04/19	S. Smith	B190	Finalize and send out subpoena with document requests to counsel for Cyrus Capital Partners.	1.30
03/05/19	M. Austin	B120	Review of Herrick filings and docket in the sears matter	2.30
03/05/19	S. Selbst	B110	Work with S. Smith on budget for engagement.	.50



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03/05/19	S. Smith	B190	Review and revise protective order for CDS participants in connection with discovery.	1.00
03/06/19	M. Austin	B110	Continued review of Herrick filings	1.50
03/06/19	M. Sekowski	B120	Miscellaneous correspondence with S. Smith and S. O'Donnell re: case strategy and budget.	.20
03/06/19	S. O'Donnell	B120	Coordinate budget per UCC request	.30
03/06/19	S. Smith	B110	Prepare budget for client and discussions with S. O'Donnell re same.	.50
03/07/19	M. Austin	B110	Review of sears notices and filings	.20
03/08/19	M. Austin	B110	Review of sears notices and filings	.20
03/08/19	M. Sekowski	B120	Review correspondence from S. Smith re: case strategy and budget.	.20
03/08/19	S. Smith	B110	Review proforma to prepare and circulate budget estimate of case for client.	1.00
03/11/19	M. Austin	B110	Review sears notices and filings	.50
03/12/19	M. Sekowski	B120	Telephone conf. with S. Smith re: Och-Ziff's written response, case strategy, protective order issues.	.30
03/12/19	M. Sekowski	B120	Review and analyze Och-Ziff's written response to the UCC's subpoena.	.20
03/12/19	S. Smith	B190	Continued review of and revisions to draft Stipulated Protective Order and t/c with M. Sekowski re same.	2.00



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03/12/19	S. Smith	B190	Review Och-Ziff's objections and responses to Subpoena and document requests (.8) and t/c with M. Sekowski re same (.2).	1.00
03/13/19	M. Sekowski	B120	Review and analyze draft protective order and correspondence with S. Smith re: same.	.30
03/13/19	S. Smith	B190	Discussions with M. Sekowski re draft stipulated protective order and prepare and send email to S. O'Donnell re same.	.50
03/14/19	L. Poretsky	B160	Review and analyze docket re objections to HF retention application (.3); Analyze Amended Case Management Order specifically for provisions related to the submission of the certificate of no objections (.4); obtain filed affidavit of service of HF retention application (.2); draft certificate of no objection (1.0); analyze docket to confirm that no objections were filed as of deadline to object	2.10
03/14/19	M. Sekowski	B120	Correspondence with team re: retention objection deadline and certification of no objection.	.10
03/14/19	M. Sekowski	B120	Attention to correspondence to subpoena recipients re: draft protective order.	.20
03/14/19	S. Selbst	B170	Attention to docket re objections to Herrick retention; email to team re status.	.50



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03/15/19	L. Poretsky	B160	Revise and finalize draft of the Certificate of No Objection; assemble underlying documents which will be submitted to judge Drain via e-mail per Amended Case Management Order; submit all to Steven Smith for review; revise Certificate of No Objection per Steve Smith comments; add exhibit A "Proposed Order"	1.80
03/15/19	S. Selbst	B160	Attention to case management order and certificate of no objection re retention.	.50
03/15/19	S. Smith	B160	Coordinate with L. Poretsky, paralegal, re preparation and filing of CNOs re retention application.	.50
03/18/19	D. King	B120	Conf. w/ Sekowski re: handling of audiotape issue	.40
03/18/19	L. Poretsky	B160	Meeting with Stephen Selbst to review case management order and discuss procedures(.6); Finalize Certificate of No Objection with exhibit and file on a docket (.8); compile service list in compliance with the case management order (.6); serve upon debtor's counsel, committee counsel, trustee (.4); draft, revise, finalize and e-file affidavit of service thereof (1.1); draft and submit e-mail to judge Drain with attached proposed order and all documents required by CMO (.4);	3.90
03/18/19	M. Austin	B110	Review of sears filings	.50



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03/18/19	M. Sekowski	B120	Attention to telephone call from M. Nowak re: subpoena to Barclays and response to same.	.10
03/18/19	S. Selbst	B160	File certificate of no objection to Herrick retention.	.40
03/19/19	M. Sekowski	B120	Telephone conf. with M. Nowak re: subpoena to Barclays.	.30
03/19/19	M. Sekowski	B120	Draft correspondence to Herrick team re: telephone conf. with M. Nowak.	.20
03/19/19	S. O'Donnell	B140	Coordinate protective order	.20
03/19/19	S. Smith	B160	Discussions with Herrick team re upcoming hearing on Herrick retention application and Certificate of No Objection.	.50
03/19/19	S. Smith	B190	Attention to, and review of, discovery issue raised by counsel for Barclays Capital in connection with Rule 2004 investigation.	.50
03/20/19	L. Poretsky	B160	Conference with judge Drain deputy to confirm the receipt of the proposed Order Authorizing to Retain and Employ Herrick, Feinstein LLP as Special Conflicts Counsel and underlying documents (.4); e-mail same to Dorothy Li for convenience and asking if we have to attend the hearing(.3); exchange e-mails and phone call with Steve Smith (.3) ; follow up with Dorothy Li re status of the proposed order (.2)	1.20



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03/20/19	M. Austin	B110	Review of electronic dilings in sears bankruptcy	.40
03/20/19	M. Sekowski	B120	Review and analyze proposed revisions to protective order.	.20
03/20/19	S. Smith	B160	Continued discussions with Herrick team re preparation for hearing on Herrick retention application.	.90
03/20/19	S. Smith	B160	Discussions with counsel for debtors and committee re Herrick retention application.	.50
03/20/19	S. Smith	B190	Review of comments from counsel for OCO and Och-Ziff to draft stipulated protective order.	1.00
03/21/19	D. King	B120	Attn to discovery issue w/ audio files	.30
03/21/19	L. Poretsky	B110	Follow up with judge Drain deputy on a status of the proposed Order Authorizing the Official Committee of Unsecured Creditors of Sears Holdings Corporation, et al. to Retain and Employ Herrick, Feinstein LLP as Special Conflicts Counsel	.30
03/21/19	S. Selbst	B110	Attend hearings on committee issues.	2.80



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03/22/19	L. Poretsky	B110	Search docket for entered order Obtain copy of the Order Authorizing the Official Committee of Unsecured Creditors of Sears Holdings Corporation, et al. to Retain and Employ Herrick, Feinstein LLP as Special Conflicts Counsel, obtain copy and circulate to the team;	.30
03/22/19	M. Austin	B110	Review of sears filings	.20
03/22/19	M. Sekowski	B120	Telephone conf. with S. Smith re: draft protective order.	.20
03/22/19	M. Sekowski	B120	Review order approving retention of Herrick.	.10
03/22/19	M. Sekowski	B120	Correspondence with S. Smith and S. O'Donnell re: case status.	.20
03/22/19	S. Smith	B110	T/C with S. O'Donnell re status report to Akin.	.20
03/22/19	S. Smith	B110	Review of and revisions to final draft of stipulated protective order and discussions with counsel for each of the CDS participants.	3.00
03/22/19	S. Smith	B160	Review signed order retaining Herrick and discussions with team re same.	.20
03/25/19	M. Sekowski	B120	Review miscellaneous correspondence re: protective order and execution of same.	.30
03/25/19	M. Sekowski	B120	Telephone conf. with S. Smith re: protective order and submission of same.	.20



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03/25/19	M. Sekowski	B120	Correspondence with Kramer Levin re: execution of protective order.	.20
03/25/19	M. Sekowski	B120	Correspondence with Milbank re: execution of protective order.	.20
03/25/19	S. O'Donnell	B120	Coordinate discovery; coordinate client update; review/comment on same; confer w/ SS re same	.50
03/25/19	S. Smith	B110	Prepare general update and budget estimate for committee and Akin.	.80
03/25/19	S. Smith	B190	Follow up discussions with each CDS Participant re finalizing Stipulated Protective Order	1.00
03/26/19	L. Poretsky	B110	Review and analyze local rules and judge Drain procedures for submission of the Stipulated Protective Order to be so-ordered(.6); assemble signature pages to the Stipulated Protective Order and request missing (.4); draft e-mail to judge Drain enclosing word and pdf versions of the order (.4)	1.40
03/26/19	M. Sekowski	B120	Draft correspondence to M. Nowak re: protective order.	.10
03/26/19	M. Sekowski	B120	Correspondence with K. Pasquale re: extension of time to respond to subpoena.	.20
03/26/19	M. Sekowski	B120	Correspondence and telephone conf. with litigation support re: database for subpoena productions and issues related to same.	.30



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03/26/19	S. O'Donnell	B210	Coordinate doc review	.30
03/27/19	L. Poretsky	B110	Conference with Steve Smith regarding submission of the Stipulated Protective Order to judge Drain to be so-ordered; revise and finalize draft of the Stipulated Protective Order; finalize PDF containing the signatures of the parties; revise and finalize e-mail to judge Drain and submit to judge Drain;	1.20
03/27/19	M. Sekowski	B120	Review correspondence from OCO and Barclays re: subpoena productions.	.30
03/27/19	M. Sekowski	B120	Telephone confs. with S. Smith and S. O'Donnell re: OCO and Barclays subpoena productions.	.30
03/27/19	M. Sekowski	B120	Correspondence with litigation support personnel re: OCO and Barclays subpoena productions.	.30
03/27/19	M. Sekowski	B120	Correspondence with M. Austin re: review of subpoena productions.	.20
03/27/19	S. O'Donnell	B110	Coordinate discovery.	.30
03/27/19	S. Selbst	B110	Attention to documents produced by Barclays and OCO in investigation.	.90
03/27/19	S. Smith	B190	Coordinate finalizing Stipulated Protective Order and sending to chambers.	.50



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03/27/19	S. Smith	B190	Review initial document production and related correspondence from OCO and Barclays and t/c with M. Sekowski re same.	1.00
03/27/19	S. Smith	B190	Discussions with M. Sekowski and S. O'Donnell re initial production of documents from OCO and Barclays.	.50
03/27/19	S. Yanway	B110	Perform data analysis of Electronically data containing document production of OCO and loaded into review database for Attorney's review.	.50
03/27/19	S. Yanway	B110	Perform data analysis of Electronically data containing document production of Barclay and loaded into review database for Attorney's review.	.70
03/28/19	L. Poretsky	B110	Review and revise Sears bill to make sure the time entries are organized by the appropriate bankruptcy court task codes; research procedure of interim fee application submission; review court Order Re Interim Compensation And Reimbursement Of Expenses Of Professionals	2.20
03/28/19	M. Austin	B420	Discussion with S. Smith and M. Sekowski re review of documents produced in response to subpoenas; discussion with S. Yanway on access to relativity re same	.90



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03/28/19	M. Sekowski	B120	Telephone conf. with M. Austin and S. Smith re: review of subpoena productions.	.60
03/28/19	S. Smith	B190	Preliminary review of document production, and responses and objections to subpoenas.	1.30
03/29/19	L. Poretsky	B110	Conference with Judge Drain deputy to confirm receipt of the Stipulated Protective Order which was submitted to be so-ordered and timing for entry on a docket;	.40
03/29/19	M. Austin	B420	Review of OCO production	1.30
03/29/19	M. Austin	B420	Review of OCO invoices	1.50
03/29/19	M. Austin	B120	First level Review of OCO production	1.20
03/29/19	M. Sekowski	B120	Correspondence with K. Pasquale re: Och-Ziff's subpoena production.	.20
03/29/19	M. Sekowski	B120	Correspondence with litigation support personnel re: Och-Ziff's subpoena production	.20
03/29/19	M. Sekowski	B120	Correspondence with M. Austin re: review of subpoena productions.	.20
03/29/19	M. Sekowski	B120	Telephone conf. with S. Smith re: subpoena productions.	.20
03/29/19	S. Smith	B190	Preliminary review of Barclays document production.	1.00
03/29/19	S. Smith	B190	T/C with M. Austin and M. Sekowski re status of review of document production.	.50



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03/29/19	S. Smith	B190	Attention to issues related to Och-Ziff document production and review of same.	.80
03/29/19	S. Yanway	B110	Perform data analysis of Electronically data from Strook and loaded into existing review database for Attorney's review.	.80
03/31/19	M. Austin	B420	Review of documents OCO and Barclays productions	4.50
Total				\$284,108.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
S. O'Donnell	37.70	985.00	37,134.50
S. Selbst	33.60	975.00	32,760.00
D. King	16.50	875.00	14,437.50
S. Smith	166.70	725.00	120,857.50
M. Sekowski	65.10	675.00	43,942.50
H. Robinson	7.20	570.00	4,104.00
A. Sheetz	9.90	400.00	3,960.00
M. Austin	16.40	370.00	6,068.00
L. Poretsky	55.60	360.00	20,016.00
S. Yanway	2.00	360.00	720.00
D. Kopf	.30	360.00	108.00



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DISBURSEMENTS

Out Of Town Travel Expenses	552.12
Shipping	18.15
Online Research	671.15
Meals	101.99
Telecommunication Costs	260.99
Office Supplies	(13.16)
Local Travel	154.50
Document Processing	384.00
Postage	11.04
Overtime	189.00
Duplicating Supplies	26.67
Velobind/binding	4.00
Duplication	819.32
Total disbursements	\$3,179.77



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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Case Administration - B110</u>		
	44.20	\$22,541.50
Subtotals	44.20	\$22,541.50

<u>Asset Analysis and Recovery - B120</u>		
	108.50	\$80,853.50
Subtotals	108.50	\$80,853.50

<u>Relief from Stay/Adequate Protection - B140</u>		
	.20	\$197.00
Subtotals	.20	\$197.00

<u>Fee/Employment Applications - B160</u>		
	68.70	\$39,757.50
Subtotals	68.70	\$39,757.50

<u>Fee/Employment Objections - B170</u>		
	1.90	\$1,712.50



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Subtotals	1.90	\$1,712.50
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Contested Matters (exclu. assumption/rejection) - B190

	156.10	\$114,027.50
Subtotals	156.10	\$114,027.50

Business Operations - B210

	.30	\$295.50
Subtotals	.30	\$295.50

General Bankruptcy Advice/Opinions - B410

	22.90	\$21,689.00
Subtotals	22.90	\$21,689.00

Restructurings - B420

	8.20	\$3,034.00
Subtotals	8.20	\$3,034.00



Simon Property Group, L.P.
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

June 21, 2019
Bill Number: 342519
File Number: 19609-0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through May 31, 2019	\$115,439.50
Expenses posted through May 31, 2019	1,040.57
TOTAL	\$116,480.07

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 16165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
04/01/19	M. Austin	B420	Review of OCH-ZIFF documents	3.70
04/01/19	M. Sekowski	B120	Correspondence with S. O'Donnell and S. Smith re: status of subpoena productions and document review.	.20
04/01/19	M. Sekowski	B120	Review and analyze correspondence from M. Austin re: status of document review, highlights in productions to date.	.30
04/01/19	M. Sekowski	B120	Telephone confs. with S. Smith re: status of subpoena productions and document review, case strategy.	.30
04/01/19	S. Smith	B190	Review update on document review and review of flagged docs.	1.00
04/01/19	S. Smith	B190	T/C with M. Sekowski re status of document production and next steps.	.20
04/01/19	S. Smith	B190	Prepare and send email status report to S. O'Donnell re status of document production and next steps.	.20
04/02/19	M. Austin	B110	Document review; correspondence re same	.80
04/02/19	M. Austin	B110	OCO and Och ziff document review	1.00
04/02/19	M. Sekowski	B120	Miscellaneous correspondence with S. Smith, M. Austin, and S. Yanway re: Cyrus production.	.20



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04/02/19	M. Sekowski	B120	Correspondence with M. Austin re: status of document review, review of Cyrus materials.	.10
04/02/19	M. Sekowski	B120	Review and analyze correspondence from M. Austin re: highlights in productions to date.	.50
04/02/19	M. Sekowski	B120	Review correspondence from K. Pierucci re: Cyrus production.	.10
04/02/19	S. O'Donnell	B110	Coordinate discovery	.20
04/02/19	S. Smith	B190	Review of document production and discussions with M. Sekowski and M. Austin re same.	2.00
04/02/19	S. Smith	B190	Review of new production from Cyrus and correspondence re same and coordinate download into Relativity.	.80
04/02/19	S. Yanway	B110	Perform data analysis of Electronically data containing Cyrus Capital document production, and loaded into database for attorneys' review.	.40
04/03/19	M. Austin	B110	Initial review of Cyrus document production	1.50
04/03/19	S. Smith	B190	T/C with M. Sekowski and M. Austin re first review of document production and next steps.	.30
04/03/19	S. Smith	B190	Continued second level review of document production and discussions with M. Austin and M. Sekowski re same.	1.60



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04/04/19	M. Austin	B110	Review of production; discussion with S. Smith and M. Sekowski	.90
04/04/19	M. Sekowski	B120	Telephone conf. with M. Austin and S. Smith re: status of and substance in CDS document productions, case strategy.	.50
04/04/19	M. Sekowski	B120	Telephone conf. with S. O'Donnell re: status of and substance in CDS document productions.	.20
04/04/19	S. O'Donnell	B110	Coordinate discovery	.30
04/04/19	S. Smith	B190	Review of M. Austin's status report on first level review of documents, including review of sampling of responsive docs.	1.00
04/04/19	S. Smith	B190	Prepare for and participate in T/C with M. Austin and M. Sekowski re first level review of document production and next steps.	.70
04/05/19	L. Poretsky	B160	Discuss with Steve Smith preparation of the consolidated monthly fee statement covering January-March 2019; review Akin Form of the monthly fee statement for information that have to be obtain from the accounting department;	.80
04/05/19	M. Austin	B110	Review of responsive production to determine to analyze characters and participants	1.00
04/05/19	S. Smith	B160	O/C with paralegal, L. Poretsky, re prep of consolidated monthly fee statement and coordinate same.	.50



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04/05/19	S. Smith	B190	Continued review of document production and preparation of timeline of events re same.	2.00
04/08/19	L. Poretsky	B160	Review and analyze Interim compensation order re procedure of the submission of the monthly fee statement (.4); submit request for backup and breakdown documents for the period from January 2 through March 31, 2019 (.4); review and analyze breakdown documents such as break downs of the amounts by attorney, task codes summary and disbursement summary (.6); conference with Steve Smith re status of final invoices for the period and drafting of the fee statement (.6); begin drafting First Combined Monthly Fee Statement (1.0)	3.00
04/08/19	M. Austin	B110	Sears document review; chart cataloguing	4.60
04/08/19	S. Smith	B160	Coordinate preparation of consolidated monthly fee statement.	.50
04/08/19	S. Smith	B190	Review Wilmington Trust's motion to prohibit use of cash collateral.	.20
04/09/19	S. Smith	B160	Coordinate with C. D'Angelo re revisions to draft invoice for consolidated Jan-March fee statement.	.20



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04/09/19	S. Smith	B190	Review of document production and follow up research re Bankruptcy Code section 363(n).	2.50
04/10/19	L. Poretsky	B160	Continue working on Monthly Fee Statement	1.00
04/10/19	M. Austin	B110	Review of character list from responsive documents and coreespondence re same; review of filings in sears matter	.90
04/10/19	M. Sekowski	B120	Review and analyze materials from M. Austin re: personnel involvement, open issues.	.40
04/10/19	M. Sekowski	B120	Correspondence with S. Smith and S. O'Donnell re: case status and strategy.	.20
04/10/19	M. Sekowski	B120	Review correspondence from S. Smith re: status of document review work.	.20
04/10/19	M. Sekowski	B120	Telephone conf. and correspondence with S. Smith re: update to Committee, document review status.	.40
04/10/19	M. Sekowski	B120	Review and analyze Cyrus and Och-Ziff subpoena productions.	5.40
04/10/19	S. O'Donnell	B110	Confer re discovery; update re same	.50



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04/10/19	S. Smith	B190	(i) Discussions with M. Austin re review of document production, including review of cast of characters spreadsheet and (ii) prepare status report for S. O'Donnell in preparation for T/C with Akin Gump.	1.00
04/10/19	S. Smith	B190	T/C with M. Sekowski re (i) review of Cyrus and Och-Ziff document production, and (ii) preparation of initial assessment memo for Akin Gump.	.50
04/10/19	S. Smith	B190	Review of OCO and Barclays document production and preparation of timeline of events re same.	3.50
04/10/19	S. Smith	B190	Discussions with S. O'Donnell re status call with Akin regarding MTN investigation and attention to email traffic re same.	.20
04/10/19	S. Smith	B190	Discussion with S. O'Donnell and M. Sekowski re status, proposed next steps in investigation.	.20
04/10/19	S. Smith	B190	T/C with S. O'Donnell and S. Brauner at Akin Gump re (i) status of MTN investigation, (ii) initial assessment and (iii) negotiation of plan.	.50
04/11/19	L. Poretsky	B160	Continue working on Monthly Fee Statement.	.50
04/11/19	M. Sekowski	B120	Review and revise draft memo to Akin re: case status and strategy.	.40



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04/11/19	M. Sekowski	B120	Correspondence and telephone confs. with S. Smith re: review of subpoena productions, case analysis and strategy.	1.00
04/11/19	S. Smith	B190	Review document production from OCO and Barclays and prepare timeline of events re same.	10.00
04/11/19	S. Smith	B190	Prepare and circulate draft Initial Assessment Memo and discussions with M. Sekowski re same.	1.50
04/12/19	L. Poretsky	B160	Continue working on Combined Monthly Fee Statement;	1.00
04/12/19	L. Poretsky	B160	Working on Combined Monthly Fee Statement	3.50
04/12/19	M. Sekowski	B120	Review correspondence from S. Smith re: draft assessment for Akin.	.20
04/12/19	S. O'Donnell	B110	Confer w/ Akin and update re discovery/analysis	.50
04/12/19	S. Smith	B190	Follow up re initial assessment with S. O'Donnell and M. Sekowski.	.40
04/12/19	S. Smith	B160	Coordinate preparation of consolidated monthly fee statement with L. Poretsky.	.20
04/14/19	S. Smith	B190	Prepare and send emails to counsel for OCO, Och-Ziff and Cyrus re scheduling meet & confer conferences.	.20



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04/15/19	L. Poretsky	B160	Request and review Itemized Disbursements report for the period from January 2 through March 31, 2019 (.4); discuss discrepancies with accounting (.3); request and review revised fee and expenses invoice (1.0); revise first combined fee statement and exhibits accordingly (1.5); submit to Steve Smith for review (.2)	3.40
04/15/19	M. Sekowski	B120	Miscellaneous correspondence with S. O'Donnell, S. Smith, I. Dizengoff, and P. Dublin re: initial assessment of CDS participants' productions and potential claims by Committee.	.20
04/15/19	M. Sekowski	B120	Correspondence with Kramer Levin re: subpoena to Barclays and meet and confer on same.	.20
04/15/19	M. Sekowski	B120	Miscellaneous telephone confs. with S. Smith re: draft assessment for Akin and status of same, meet and confer strategy.	.50
04/15/19	M. Sekowski	B120	Review file and outline issues for meet and confers with CDS Participants.	1.60
04/15/19	S. O'Donnell	B110	Coordinate discovery; confer w/ Akin re same analysis; review/revise update re same; calls/emails re same	1.00



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04/15/19	S. Smith	B190	T/C with S. O'Donnell re initial assessment for Akin and prepare and send email to Akin team re same.	.70
04/15/19	S. Smith	B190	Exchange emails with Akin Gump re initial assessment of claims.	.20
04/15/19	S. Smith	B190	Follow up document review in preparation for meet and confer conferences.	.50
04/15/19	S. Smith	B190	Follow up discussions with counsel for CDS Participants scheduling meet and confer conferences.	.40
04/15/19	S. Smith	B190	Review meet & confer checklist and T/C with M. Sekowski re same.	.50
04/15/19	S. Smith	B190	Prepare and send emails to CDS Participants requesting meet & confer conferences to discuss document production.	.50
04/16/19	M. Sekowski	B120	Miscellaneous correspondence re: additional meet and confer conferences and preparation for same.	.20
04/16/19	M. Sekowski	B120	Prepare for and participate in telephonic meet and confer with S. Sparling, M. Nowak, and S. Smith re: Barclays subpoena production.	.50
04/16/19	S. O'Donnell	B110	Coordinate discovery	.50



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04/16/19	S. Smith	B190	Follow up review of documents produced by Och Ziff and Cyrus and revise timeline of events in preparation for meet and confer conferences with Och Ziff and Cyrus.	1.50
04/16/19	S. Smith	B190	Prepare for and host meet and confer conference with counsel for Barclays.	.80
04/16/19	S. Smith	B190	Coordinate review and production of Barclays documents with lit support and exchange emails with counsel for Barclays re same.	.80
04/16/19	S. Yanway	B110	Create draft document production for attorney approval in Portable Document Format image with optical character recognition, appropriate endorsements as requested form Barclays' production.	.20
04/17/19	M. Austin	B110	Review of case filings	.10
04/17/19	M. Sekowski	B120	Prepare for and participate in telephonic meet and confer with R. Liubicic, K.Pierucci, and S. Smith re: Cyrus subpoena production.	.40
04/17/19	M. Sekowski	B120	Prepare for and participate in telephonic meet and confer with K. Pasquale, I. Sasson, and S. Smith re: OZ subpoena production.	.40
04/17/19	S. Smith	B190	(i) Prepare for and host meet and confer conferences with counsel for Och Ziff and counsel to Cyrus and (ii) T/C with M. Sekowski re same.	1.50



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04/18/19	L. Poretsky	B160	Review further revised draft of the HF invoice. Revise, proofread and finalize First Fee Statement per revised draft of the HF invoice.	1.30
04/18/19	M. Sekowski	B120	Review and analyze miscellaneous correspondence from S. Smith re: update, meet and confer with OCO.	.20
04/18/19	M. Sekowski	B120	Draft correspondence to S. O'Donnell re: update on meet and confers, case strategy.	1.00
04/18/19	S. O'Donnell	B110	Coordinate discovery	.50
04/18/19	S. Smith	B190	Preparation of preliminary draft summary overview of meet and confer conferences for S. O'Donnell and M. Sekowski.	.20
04/18/19	S. Smith	B190	(i) Prepare for and conduct meet and confer conference with counsel for OCO and (ii) prepare summary update for M. Sekowski re same.	1.00
04/18/19	S. Smith	B160	T/C with L. Poretsky re first consolidated monthly fee statement and review draft.	.50
04/19/19	S. Smith	B160	Review draft consolidated monthly fee statement and exchange emails with L. Poretsky re same.	.50
04/22/19	M. Austin	B110	Research on common interest privilege	2.40
04/23/19	M. Austin	B110	Research on common interest and joint defense privilege; drafting of email memo re same; correspondence re same	3.80



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04/23/19	M. Sekowski	B120	Review, analyze, and annotate research and case law from M. Austin re: common interest privilege as to business transactions.	1.00
04/23/19	M. Sekowski	B120	Strategize for potential challenge to OCO and Och-Ziff's assertion of common interest privilege.	.50
04/24/19	L. Poretsky	B160	Review and analyze fee procedures order to find out objection deadlines; finalize draft of the first monthly fee statement and assemble exhibits; meeting with Stephen Selbst to review and discuss first monthly fee statement and revise per comments; submit same to Sean O'Donnell for review and comments;	1.70
04/24/19	S. Smith	B160	Coordinate review of consolidated monthly fee statement and exchange emails with L. Poretsky (paralegal) re same.	.30
04/25/19	M. Sekowski	B120	Review correspondence from K. Pierucci re: meet and confer follow up.	.20
04/25/19	S. Smith	B160	Continued coordination of prep of first consolidated monthly fee statement.	.40
04/26/19	L. Poretsky	B160	Follow up on a status of the review of first fee statement	.30
04/26/19	M. Sekowski	B120	Review and analyze hearing notice.	.10



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04/26/19	M. Sekowski	B120	Review and analyze correspondence from K. Pasquale re: Och-Ziff's privilege log.	.20
04/26/19	M. Sekowski	B120	Review and analyze correspondence from E. Hess re: OCO's privilege log.	.10
04/26/19	M. Sekowski	B120	Attention to preliminary analysis of OCO's and Och-Ziff's privilege logs.	.50
04/29/19	M. Sekowski	B120	Telephone conf. with S. Smith re: meet and confer follow ups and strategy for same.	.20
04/29/19	S. Smith	B190	Review of privilege logs and common interest privilege research.	1.00
04/30/19	L. Poretsky	B160	Submit copy of the First Fee Statement to Sean O'Donnell for review; prepare revised statement and exhibits and submit to Steve Smith for further circulation for approval;	.40
04/30/19	M. Sekowski	B120	Review and analyze correspondence from K. Pierucci re: Cyrus's privilege log.	.20
04/30/19	M. Sekowski	B120	Review correspondence from S. Smith and S. Sparling re: status of Barclays' supplemental production.	.10
04/30/19	M. Sekowski	B120	Telephone conf. with S. Smith re: common interest privilege and potential challenge to same.	.30



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04/30/19	M. Sekowski	B120	Draft correspondence to M. Austin re: review of privilege logs, common interest privilege and potential challenge to same.	.20
04/30/19	S. Smith	B160	Final review of first consolidated monthly fee statement and send to Akin and client for review.	.80
04/30/19	S. Smith	B190	Review privilege logs and related correspondence.	1.50
05/01/19	M. Austin	B110	Discussion with sean O'donnell; steve smith; M. Sekowski re common interest privilege and discovery progress	.50
05/01/19	M. Sekowski	B120	Correspondence with M. Austin and S. Smith re: privilege log analysis.	.20
05/01/19	M. Sekowski	B120	Telephone conf. and correspondence with S. Smith re: open discovery issues and strategy for same.	.30
05/01/19	M. Sekowski	B120	Telephone confs. with S. O'Donnell, S. Smith, and M. Austin re: case status and strategy, privilege log analysis.	.90
05/01/19	S. O'Donnell	B410	Strategy and analysis; confer w/ team re same	1.20
05/01/19	S. Smith	B190	Attention to and analysis of common interest privilege in connection with review of produced privilege logs.	1.00



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05/01/19	S. Smith	B190	Prepare for and participate in Herrick team call re status of discovery and discussion of next steps.	1.00
05/01/19	S. Smith	B190	Review status of discovery and prepare list of missing items and open issues for follow up meet & confer conferences.	1.00
05/02/19	M. Sekowski	B120	Correspondence with S. Smith and S. Yanway re: supplemental production from Barclays.	.20
05/02/19	M. Sekowski	B120	Review correspondence from M. Nowak re: supplemental production from Barclays.	.20
05/02/19	S. Yanway	B110	Perform data analysis of Electronically Stored Information from Barclay and loaded into relativity for counsel review..	.60
05/03/19	M. Austin	B110	Research re common interest privilege	3.90
05/03/19	M. Austin	B110	Research on elements re privilege log and common interest privilege	1.70
05/03/19	M. Austin	B110	Research on federal standard re privilege logs and assertion of privilege	1.20
05/03/19	M. Sekowski	B120	Review correspondence from S. Smith and S. Brauner re: case status.	.10
05/06/19	M. Austin	B110	Review of privilege log ; additional research on common interest privilege	.90



Re: **Sears Bankruptcy**

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05/06/19	M. Sekowski	B120	Telephone conf. with S. Smith re: analysis of privilege log, Barclays' supplemental production and review of same.	.30
05/06/19	M. Sekowski	B120	Telephone conf. with M. Austin re: analysis of privilege log.	.50
05/07/19	M. Austin	B110	Review and analysis of Och- Ziff Privilege log	4.00
05/07/19	M. Austin	B110	Continued review of OCO privilege log ; drafting of memo re same; research	5.20
05/07/19	S. Smith	B190	Review second round of Barclays document production.	2.50
05/08/19	M. Austin	B110	Additional review of och-ziff privilege log; drafting of memo re same	3.50
05/08/19	M. Austin	B110	Review of memo	.70
05/08/19	M. Sekowski	B130	Review and analyze memo from M. Austin re: common interest privilege and log analysis.	.30
05/08/19	S. Smith	B190	Continued analysis re common interest privilege and review of new documents.	1.00
05/08/19	S. Smith	B190	Exchange emails with S. Brauner at Akin re MTN investigation and follow up with Herrick team re same.	.20
05/09/19	S. Smith	B190	Continued analysis of common interest privilege, privilege logs and open meet & confer issues.	1.30



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05/10/19	M. Sekowski	B120	Review and analyze additional common interest case law from M. Austin.	.30
05/10/19	M. Sekowski	B120	Correspondence with S. Smith re: review of supplemental Barclays production.	.10
05/10/19	S. Smith	B190	Follow up analysis of common interest privilege.	.50
05/13/19	J. Skidmore	B190	Reviewed privileged logs for entries of communications between attorneys.	2.20
05/13/19	M. Austin	B110	Review of research and memo; Discussion with S. Smith & M. Sekowski RE privilege log and Common interest privilege memo	1.20
05/13/19	M. Sekowski	B120	Telephone conf. with M. Austin and S. Smith re: common interest and privilege log analysis.	.50
05/13/19	M. Sekowski	B120	Research re: applicability of privilege to communications with PR consultant.	1.00
05/13/19	M. Sekowski	B120	Review and analyze Cyrus production re: potential challenge to privilege assertions over communications with PR consultant.	.50
05/13/19	M. Sekowski	B120	Telephone conf. and correspondence with M. Austin re: additional privilege log analysis.	.40



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05/13/19	M. Sekowski	B120	Review correspondence from S. Smith and S. Sparling re: Barclays privilege log and open discovery issues.	.10
05/13/19	S. Smith	B190	Prepare for and participate in T/C re analysis of common interest privilege and privilege logs.	.80
05/13/19	S. Smith	B190	Discussions with counsel for Barclays re status of production of privilege log and responses to outstanding discovery questions.	.40
05/14/19	M. Sekowski	B120	Correspondence with S. Smith and S. O'Donnell re: strategy and call with Akin.	.20
05/14/19	S. O'Donnell	B410	Motion to compel analysis	.50
05/14/19	S. Smith	B190	Exchange emails with S. Brauner of Akin re scheduling conference call for status update and emails with Herrick team re same.	.10
05/15/19	M. Sekowski	B120	Draft, review, and revise correspondence to S. O'Donnell re: status of privilege analyses.	.60
05/15/19	M. Sekowski	B120	Correspondence with S. Smith re: update for S. O'Donnell and preparation of same.	.20
05/15/19	M. Sekowski	B120	Review correspondence from M. Nowak re: Barclays privilege log and supplemental production.	.20
05/15/19	S. O'Donnell	B410	Strategy and analysis re privilege and motion to compel	.50



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05/15/19	S. Smith	B190	Review email from counsel for Barclays with privilege log and preliminary review of log.	.30
05/15/19	S. Smith	B190	Review draft email to S. O'Donnell re analysis of common interest privilege, privilege log analysis and next steps and exchange emails with M. Sekowski re same.	.30
05/16/19	M. Sekowski	B120	Correspondence with S. O'Donnell and S. Smith re: status of privilege analyses, legal research on same.	.20
05/16/19	M. Sekowski	B120	Correspondence with M. Nowak and S. Smith re: Barclays supplemental production.	.20
05/16/19	S. O'Donnell	B410	Strategy and analysis	.50
05/16/19	S. Smith	B185	Attention to issues re Barclays production and review email exchange re same.	.80
05/16/19	S. Smith	B190	Review of Barclays documents and follow up analysis of privilege logs.	1.50
05/16/19	S. Smith	B190	Follow up common interest analysis and prepare for and participate in T/C with Herrick team re same.	1.00
05/17/19	M. Austin	B420	Phone discussion with Akin Counsel re progress on production re subpoena; discussion with S. Smith re same	1.30
05/17/19	M. Sekowski	B120	Review correspondence from M. Nowak re: supplemental Barclays production.	.20



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05/17/19	M. Sekowski	B120	Telephone conf. with S. Brauner, S. O'Donnell, and S. Smith re: case status and strategy, privilege challenges.	.40
05/17/19	S. O'Donnell	B110	Case admin	.30
05/17/19	S. O'Donnell	B110	Update to Akin	.30
05/17/19	S. O'Donnell	B410	Priv analysis	.40
05/17/19	S. Smith	B190	Prepare for and participate in T/C with S. Brauner of Akin re status of MTN investigation, status of disclosure statement/plan process, and proposed next steps.	.90
05/17/19	S. Smith	B190	Review new Barclays document production and attention to email traffic re same.	1.30
05/20/19	L. Poretsky	B160	Revise, finalize, file on a docket First Combined Monthly Fee Statement of Herrick, Feinstein LLP for Professional Services Rendered and Disbursements; prepare and submit e-mail to Prime Clerk requesting service of the fee statement;	.90
05/20/19	M. Sekowski	B120	Correspondence and telephone conf. with S. Smith re: draft correspondence to CDS participants on privilege logs.	.20
05/20/19	S. Smith	B160	Review consolidated monthly fee statement and coordinate filing of same.	.50



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05/21/19	M. Sekowski	B120	Miscellaneous correspondence and telephone conf. with S. Yanway re: Barclays production issues.	.20
05/21/19	M. Sekowski	B120	Review and revise correspondence to Stroock re: issues with OZ's privilege log.	.20
05/21/19	M. Sekowski	B120	Correspondence with S. O'Donnell, S. Smith and M. Austin re: draft correspondence to CDS participants on privilege deficiencies.	.20
05/21/19	M. Sekowski	B120	Telephone conf. with Kramer Levin and S. Smith re: open issues for Barclays discovery.	.30
05/21/19	M. Sekowski	B120	Telephone confs. and correspondence with S. Smith re: draft correspondence to CDS participants.	.40
05/21/19	M. Sekowski	B120	Review and revise correspondence to Quinn re: issues with OCO's privilege log.	.20
05/21/19	M. Sekowski	B120	Draft correspondence to Milbank re: issues with Cyrus's privilege log.	.30
05/21/19	S. Smith	B190	Prepare correspondence to counsel for OCO and Och-Ziff re discovery issues.	.90
05/21/19	S. Smith	B190	Review Barclays supplemental document production and attention to email traffic re same.	1.00



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05/21/19	S. Smith	B190	Follow up review of Barclays supplemental document production and review timeline accordingly.	1.50
05/21/19	S. Smith	B190	T/C with M. Sekowski re discovery issues and draft letters to counsel for CDS participants.	.20
05/21/19	S. Smith	B190	Prepare for and conduct T/C meet & confer with counsel for Barclays re open discovery issues.	1.00
05/21/19	S. Yanway	B110	Perform data analysis of Electronically Stored Information from Barclay and loaded into relativity for counsel review.	.30
05/22/19	M. Sekowski	B120	Correspondence with S. O'Donnell, S. Smith and M. Austin re: draft correspondence to Milbank on privilege deficiencies.	.20
05/22/19	M. Sekowski	B120	Review correspondence from M. Nowak re: reproduction of Bloomberg chats.	.20
05/22/19	M. Sekowski	B120	Review and revise correspondence to Milbank on privilege deficiencies.	.20
05/22/19	M. Sekowski	B120	Correspondence with S. Yanway re: reproduction of Bloomberg chats.	.20
05/22/19	S. Smith	B190	Review updated email and draft correspondence to CDS participants re open discovery issues.	.50



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05/23/19	M. Sekowski	B120	Telephone call to S. O'Donnell re: status of correspondence to CDS participants.	.10
05/23/19	M. Sekowski	B120	Correspondence with S. Yanway re: reproduced Bloomberg chats.	.20
05/23/19	S. Yanway	B110	Perform data analysis of Electronically Stored Information from Barclay and loaded into relativity for counsel review.	.20
05/24/19	M. Sekowski	B120	Correspondence with S. Smith re: status of deficiency issues with CDS participants.	.10
05/27/19	S. O'Donnell	B110	Case admin	.50
05/28/19	M. Sekowski	B120	Correspondence with S. O'Donnell and S. Smith re: privilege issues and confs. on same.	.20
05/28/19	M. Sekowski	B120	Miscellaneous correspondence with S. Smith and CDS participants re: additional meet and confer on privilege issues.	.30
05/28/19	S. O'Donnell	B190	Confer w/team re review/revise correspondence to various parties re priv log and assertion	.50
05/28/19	S. O'Donnell	B190	Review/revise correspondence to various parties re priv log and assertion	.50
05/28/19	S. Smith	B190	Review revisions to draft correspondence to counsel for CDS participants re discovery issues and finalize and send correspondence.	.50



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05/28/19	S. Smith	B190	Follow up discussion re open discovery issues and exchange emails with counsel for CDS participants re same.	.80
05/29/19	L. Poretsky	B120	Assist Maame Austin with preparation of the motion to compel discovery of privileged materials and other request;	1.00
05/29/19	M. Austin	B110	Further Research and outline of motion to compel discovery; correspondence and phone discussion re same	6.00
05/29/19	S. O'Donnell	B110	Coordinate meet and confer	.50
05/29/19	S. Smith	B190	(i) Discussions with Herrick team re open discovery issues, (ii) schedule and prepare for meet & confer conferences, and (iii) review of draft outline for request for discovery conference.	1.30
05/30/19	M. Austin	B110	First draft of letter to court re motion to compel	1.50
05/30/19	M. Austin	B110	Discussion with S. Smith ; further editing of outline and research on Drain Case law	.50
05/30/19	M. Sekowski	B120	Correspondence with S. Yanway re: Barclays production issue.	.20
05/30/19	M. Sekowski	B120	Review, analyze, and revise outline for potential motion to compel.	.30
05/30/19	M. Sekowski	B120	Telephone conf. with S. Smith re: preparation for upcoming meet and confers.	.20



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05/30/19	M. Sekowski	B120	Correspondence with S. Smith re: legal research on privilege applicability to PR firms.	.20
05/30/19	M. Sekowski	B120	Prepare for and participate in meet and confer call with Milbank re: Cyrus privilege log.	.80
05/30/19	M. Sekowski	B120	Telephone conf. with S. Smith re: Milbank meet and confer, case strategy.	.20
05/30/19	S. Smith	B190	Research privilege issues re sharing communications with public relations team and common interest.	1.00
05/30/19	S. Smith	B190	Prepare for and conduct second meet & confer with counsel for Cyrus re open discovery questions and related issues.	1.00
05/30/19	S. Smith	B190	Follow up research on common interest and review draft letter to Court re same.	1.50
05/31/19	M. Austin	B110	Further drafting of letter to court re MTC	1.00
05/31/19	M. Austin	B110	First draft of letter to court re motion to compel	.20
05/31/19	M. Sekowski	B120	Miscellaneous correspondence with S. Yanway re: Barclays production issues.	.20
05/31/19	M. Sekowski	B120	Miscellaneous correspondence with Stroock and Quinn re: meet and confer.	.20



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05/31/19	M. Sekowski	B120	Telephone conf. and correspondence with S. Smith re: meet and confer with Stroock and Quinn and issues related to same.	.20
05/31/19	M. Sekowski	B120	Review correspondence from K. Pierucci re: additional Cyrus production.	.10
05/31/19	S. O'Donnell	B120	MTC analysis	.50
05/31/19	S. Smith	B190	Prepare for meet & confer conference with counsel for OCO and Och-Ziff including analysis of issues related to privilege log and common interest privilege.	1.00
05/31/19	S. Smith	B190	Follow up analysis re open discovery issues in preparation for upcoming meet and confer conferences.	.80
05/31/19	S. Smith	B190	Follow up review of documents produced by CDS participants in light of privilege assertions and meet & confer conferences.	.70
05/31/19	S. Yanway	B110	Perform data analysis of Electronically Stored Information from Barclay and loaded into existing review database.	.30
Total				\$115,439.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
S. O'Donnell	9.70	985.00	9,554.50



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<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
S. Smith	75.60	725.00	54,810.00
M. Sekowski	33.80	675.00	22,815.00
M. Austin	54.00	370.00	19,980.00
J. Skidmore	2.20	360.00	792.00
L. Poretsky	18.80	360.00	6,768.00
S. Yanway	2.00	360.00	720.00

DISBURSEMENTS

Out Of Town Travel Expenses	0.00
Online Research	248.25
Pacer Charges	40.10
Telecommunication Costs	93.00
Office Supplies	0.00
Document Processing	156.00
Duplication	203.22
E-Discovery Data Hosting	300.00

Total disbursements	\$1,040.57
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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Case Administration - B110</u>		
	56.10	\$23,873.50
Subtotals	56.10	\$23,873.50

<u>Asset Analysis and Recovery - B120</u>		
	35.00	\$23,465.00
Subtotals	35.00	\$23,465.00

<u>Asset Deposition - B130</u>		
	.30	\$202.50
Subtotals	.30	\$202.50

<u>Fee/Employment Applications - B160</u>		
	22.20	\$9,598.00
Subtotals	22.20	\$9,598.00

<u>Assumption/Rejection of Leases/Contracts - B185</u>		
	.80	\$580.00



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Subtotals	.80	\$580.00
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Contested Matters (exclu. assumption/rejection) - B190

	73.60	\$52,817.00
Subtotals	73.60	\$52,817.00

General Bankruptcy Advice/Opinions - B410

	3.10	\$3,053.50
Subtotals	3.10	\$3,053.50

Restructurings - B420

	5.00	\$1,850.00
Subtotals	5.00	\$1,850.00



HERRICK

FEDERAL ID: 13-2991662

Simon Property Group, L.P.
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

September 30, 2019
Bill Number: 346307
File Number: 19609-0001

Re: Sears Bankruptcy

Fees for legal services rendered through August 31, 2019	\$119,650.50
Expenses posted through August 31, 2019	627.56
TOTAL	\$120,278.06

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 021000089
Account Number: 4971716165
SWIFT #: CITIUS33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
06/02/19	M. Austin	B110	Drafting of letter brief to compel discovery;	4.00
06/03/19	L. Poretsky	B160	Conference with Steve Smith regarding fee statement for April and May; request billing information from accounting and S. O'Donnell secretary;	.50
06/03/19	M. Austin	B110	Meet and Confer with Quinn and Stroock on privilege related matters.	.30
06/03/19	M. Sekowski	B120	Telephone conf. with S. Smith re: call with OCO and Och-Ziff, Cyrus production, Barclays production, case strategy.	.30
06/03/19	M. Sekowski	B120	Correspondence with S. Yanway re: additional Cyrus production.	.20
06/03/19	M. Sekowski	B120	Prepare for and participate in telephone conf. with S. O'Donnell, S. Smith, A. Corkhill, and K. Pasquale re: privilege asserted by OCO and Och-Ziff and potential challenge to same.	.40
06/03/19	M. Sekowski	B120	Review and analyze additional Cyrus production.	.50
06/03/19	S. O'Donnell	B110	Prep and participate in meet and confer	.50
06/03/19	S. O'Donnell	B410	F/up analysis re meet and confer	.50



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06/03/19	S. Smith	B190	Post-meet & confer follow up and analysis of open discovery issues.	2.00
06/03/19	S. Smith	B190	Prepare for and participate in meet & confer conference with counsel for OCO and Och-Ziff.	1.00
06/03/19	S. Smith	B190	Review of new production of documents.	1.50
06/03/19	S. Yanway	B110	Perform data analysis of Electronically Stored Information of CYRUS production and loaded into review database.	.40
06/04/19	S. Smith	B190	Continued analysis of open discovery issues including common interest and privilege log, and review latest document production.	1.50
06/05/19	M. Sekowski	B120	Attention to analysis of open discovery issues, status of supplemental productions and potential motion to compel.	1.20
06/05/19	S. Smith	B160	Follow up prep of email re payment of fees and discussions with C. D'angelo re preparation of invoice.	.30
06/05/19	S. Smith	B160	Review of fee procedures order and exchange emails with S. Brauner re payment of 80% fees and 100% holdback and prepare email re same.	.50
06/06/19	S. Smith	B160	Finalize and send off email with approved monthly fee statement and invoice and discussions with billing coordinator re same.	.50



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06/06/19	S. Smith	B190	Review latest document production, revise timeline, and analysis of open discovery issues.	3.50
06/07/19	H. Velastiegui	B110	Perform data analysis of Electronically Stored Information. Download from site and loaded into review platform.	.30
06/07/19	M. Sekowski	B120	Review correspondence from E. Hess re: supplemental OCO production and correspondence with litigations support re: same.	.30
06/07/19	S. Smith	B190	Continued review of latest document production, email exchanges re same and open issues on meet & confer list.	2.50
06/10/19	L. Poretsky	B160	Follow up on a status of the billing information with accounting and S. O'Donnell secretary in connection with the Fee statement application for April and May;	.30
06/10/19	M. Sekowski	B120	Review and analyze filings and bidding procedures for potential challenge to joint interest privilege assertion.	1.50
06/11/19	M. Sekowski	B120	Review and analyze additional OCO production.	.30
06/12/19	M. Sekowski	B120	Telephone conf. with S. Smith re: case status and strategy.	.20



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06/12/19	S. Smith	B160	Exchange emails with T. Kim of M-III Partners re outstanding invoice and accrual info going forward and internal discussions re same.	.30
06/14/19	L. Poretsky	B160	Follow up on request for April and May, 2019 HF invoices in order to prepare fee statement and review draft	.60
06/17/19	L. Poretsky	B160	Review and analyze invoices for April and May 2019 period (.8); draft second combined fee statement (2.0); request missing information from accounting department (.3)	3.10
06/17/19	M. Sekowski	B120	Telephone confs. and miscellaneous correspondence with S. Smith re: case status and action plan.	.40
06/17/19	M. Sekowski	B120	Draft, review, and revise action plan for pending discovery dispute, case going forward.	.50
06/17/19	M. Sekowski	B120	Correspondence with S. Smith and S. O'Donnell re: case status and strategy.	.20
06/17/19	S. O'Donnell	B110	Review action plan	.30
06/17/19	S. O'Donnell	B110	Confer w/ team re action plan	.30
06/17/19	S. O'Donnell	B120	Coordinate Analysis re motion to compel	.40
06/17/19	S. Smith	B190	T/C with M. Sekowski re preparation of action plan and review same.	.80



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06/17/19	S. Smith	B190	T/C with D. King re status and next steps re discovery issues and forward draft docs re same.	.40
06/17/19	S. Smith	B190	Review status of Och Ziff privilege log and t/c with K. Pasquale of Stroock re same.	.20
06/17/19	S. Smith	B160	Review draft second fee statement.	.50
06/18/19	D. King	B110	T/c S. Smith re: status (.4); conf M. Sekowski re: work in progress (.4)	.80
06/18/19	L. Poretsky	B160	Review documents from accounting department and submit request for missing documents in connection with the second HF fee statement	.30
06/18/19	M. Sekowski	B120	Review and revise action plan for pending discovery dispute.	.20
06/18/19	M. Sekowski	B120	Conf. with D. King re: case status and strategy.	.30
06/18/19	M. Sekowski	B120	Correspondence with S. O'Donnell, S. Smith, D. King, and M. Austin re: action plan for pending discovery dispute.	.20
06/18/19	M. Sekowski	B120	Telephone conf. with S. Smith and S. O'Donnell re: case status and action plan for pending discovery dispute.	.40
06/18/19	S. O'Donnell	B410	Team meeting	.50
06/18/19	S. O'Donnell	B410	Plan for team meeting	.50
06/18/19	S. Smith	B190	T/C with D. King re open discovery issues.	.20



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06/18/19	S. Smith	B190	Prepare for and participate in Herrick team t/c with discovery issues.	.70
06/18/19	S. Smith	B190	Conduct follow up research re case and subsequent case law on possible claims and causes of action.	2.00
06/19/19	D. King	B120	Review draft memos, letter brief	2.50
06/19/19	M. Austin	B110	Pulling Joele Frank documents	.60
06/19/19	M. Sekowski	B120	Telephone confs. with S. Smith re: action plan and draft correspondence to Judge Drain.	.30
06/19/19	M. Sekowski	B120	Correspondence and telephone conf. M. Austin re: Joele Frank communications.	.10
06/19/19	M. Sekowski	B120	Correspondence with S. Smith re: revised draft letter to Judge Drain.	.20
06/19/19	M. Sekowski	B120	Draft correspondence to S. O'Donnell re: Joele Frank communications and potential challenge to same.	.20
06/19/19	M. Sekowski	B120	Review, analyze, and revise draft letter to Judge Drain re: OCO and Och-Ziff common interest issue.	1.40
06/19/19	S. O'Donnell	B410	Analysis re motion to compel	.50
06/19/19	S. Smith	B190	Review of and revisions to draft letter to Judge Drain requesting discovery conference and exchange emails with M. Sekowski re same.	.50



Re: **Sears Bankruptcy**

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06/19/19	S. Smith	B190	Analysis re open discovery issues and exchange emails with counsel for Och-Ziff re updated privilege log.	.50
06/20/19	M. Sekowski	B120	Telephone conf. with S. Smith re: revisions to draft letter to Judge Drain.	.20
06/20/19	M. Sekowski	B120	Review and revise draft letter to Judge Drain.	.20
06/20/19	M. Sekowski	B120	Draft correspondence to D. King re: draft letter to Judge Drain and revisions to same.	.10
06/20/19	S. Smith	B190	Review of and revisions to draft letter to Judge Drain requesting discovery conference and t/c with M. Sekowski re same.	.50
06/20/19	S. Smith	B190	Continued follow up research for claims and causes of action based upon review of discovery.	1.00
06/21/19	M. Sekowski	B120	Miscellaneous correspondence with S. Smith re: revised log and supplemental production from Och-Ziff, draft letter to Judge Drain.	.20
06/21/19	S. Smith	B190	Exchange emails with counsel for Och-Ziff re revised privilege log and documentation production and review open issues.	.50
06/24/19	D. King	B120	Review draft discovery dispute letter, revise same	.60
06/24/19	M. Sekowski	B120	Correspondence with D. King re: revisions to draft letter to Judge Drain.	.20



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06/24/19	M. Sekowski	B120	Attention to incorporation of edits into draft letter to Judge Drain.	.20
06/24/19	M. Sekowski	B120	Draft correspondence to S. O'Donnell re: draft letter to Judge Drain.	.10
06/24/19	M. Sekowski	B120	Miscellaneous correspondence with S. Smith re: status of supplemental log and production by Och-Ziff.	.20
06/24/19	M. Sekowski	B120	Correspondence with Litigation Support re: supplemental production by Och-Ziff.	.10
06/24/19	S. Smith	B190	(i) Review revised letter to Judge Drain, and (ii) preliminary review of revised privilege log and document production.	.50
06/25/19	H. Velastiegui	B110	Perform data analysis of Electronically Stored Information.	.50
06/25/19	M. Sekowski	B120	Review correspondence from S. Smith re: OZ production and review of same.	.10
06/25/19	M. Sekowski	B120	Conf. with D. King re: case status, draft letter to Judge Drain, OZ production.	.20
06/25/19	M. Sekowski	B120	Correspondence with Litigation Support re: OZ production.	.20
06/25/19	S. Smith	B190	Preliminary review of revised privilege logs and additional document production.	1.00



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06/26/19	S. Smith	B190	Review latest production of documents from Och-Ziff and t/c with M. Sekowski re same and revised privilege logs.	1.50
06/27/19	M. Sekowski	B120	Telephone conf. with S. Smith re: analysis of Och-Ziff privilege logs, strategy for same.	.40
06/27/19	M. Sekowski	B120	Draft correspondence to S. O'Donnell re: analysis of Och-Ziff privilege logs, open issues, and strategy for same.	.40
06/27/19	M. Sekowski	B120	Review, analyze, and annotate revised Och-Ziff privilege logs.	2.00
06/28/19	D. King	B120	Attn to update re: discovery dispute	.20
06/28/19	M. Sekowski	B120	Review, analyze, and revise update to committee .	.20
06/28/19	M. Sekowski	B120	Review file re: production counts for committee update request.	.20
06/28/19	M. Sekowski	B120	Telephone confs. with S. Smith re: revisions to update to committee.	.30
06/28/19	M. Sekowski	B120	Correspondence with S. Smith and S. O'Donnell re: Och-Ziff issues and strategy.	.20
06/28/19	M. Sekowski	B120	Miscellaneous correspondence with S. Smith and S. O'Donnell re: Committee update request.	.20
06/28/19	S. O'Donnell	B110	Coordinate Analysis re motion to compel	.10
06/28/19	S. O'Donnell	B140	Review/revise update and finalize reply	.40



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06/28/19	S. Smith	B190	(i) Prepare status report on MTN investigation and circulate to Akin and Herrick teams, (ii) t/c with M. Sekowski re same, and (iii) exchange emails with S. O'Donnell re same.	1.00
06/28/19	S. Smith	B190	Continued analysis of 363(n) causes of action and preliminary review of amended plan.	1.00
06/28/19	S. Smith	B190	T/C with M. Sekowski re open discovery issues re Och-Ziff privilege log and latest document production.	.50
06/28/19	S. Smith	B190	(i) review email from S. Brauner at Akin re update on MTN investigation, (ii) T/C with S. O'Donnell re preparation of update for committee and (iii) exchange emails with M. Sekowski re same.	.20
06/28/19	S. Smith	B110	Coordinate preparation of weekly accrual report for Tyler Kim and M-iii Partners.	.20
06/30/19	S. Smith	B320	Preliminary review of amended plan and liquidation trust mechanics.	.80
07/01/19	M. Sekowski	B120	Review correspondence from S. Brauner re: update on status of MTN investigation.	.20
07/01/19	M. Sekowski	B120	Review correspondence from S. Smith and S. O'Donnell re: trust board issues.	.20



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07/01/19	S. Smith	B320	T/C with S. Brauner at Akin re status and formation of liquidating trust mechanics.	.50
07/02/19	D. King	B120	Follow up on discovery issues w/ team	.30
07/02/19	S. Smith	B190	Follow up analysis on discovery issues and review of case law on potential causes of action.	1.20
07/03/19	D. King	B120	Attn to email re: questions from Akin (.3); emails re: team call to discuss open issues (.1)	.40
07/03/19	M. Sekowski	B120	Miscellaneous correspondence with S. Smith and S. O'Donnell re: status of OZ meet and confer.	.20
07/03/19	M. Sekowski	B120	Correspondence with S. O'Donnell and S. Smith re: questions from M. Dundon on status of MTN investigation.	.20
07/03/19	M. Sekowski	B120	Review correspondence from M. Dundon re: questions on status of MTN investigation.	.10
07/03/19	S. Smith	B190	Review email from M. Dundon with questions on MTN investigation and exchange emails with S. Brauner from Akin re same.	.30
07/03/19	S. Smith	B190	Exchange emails with Herrick team re open discovery issues and scheduling of follow up meet & confer.	.30



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07/03/19	S. Smith	B190	Prepare and send email request for follow up meet & confer to counsel for Och Ziff and exchange emails with counsel re same.	.30
07/04/19	S. O'Donnell	B110	Confer w/team re reply to committee inquiry	.10
07/04/19	S. O'Donnell	B110	Review/prepare reply to committee inquiry	.30
07/04/19	S. O'Donnell	B410	Confer w/ Akin re strategy update	.30
07/04/19	S. Smith	B190	Review S. Brauner email to Committee re status of MTN investigation and related issues and follow up emails.	.30
07/04/19	S. Smith	B190	Exchange emails with S. O'Donnell re committee questions on MTN investigation.	.20
07/05/19	S. O'Donnell	B110	Review/comment on client update	.40
07/05/19	S. O'Donnell	B410	Prep and participate in strategy/update call w/ Akin	.40
07/05/19	S. O'Donnell	B410	Confer w/ team re strategy/update call w/ Akin	.40
07/05/19	S. Smith	B190	Prepare for and participate in t/c with Akin team re status of MTN investigation, discovery issues and next steps.	1.50
07/08/19	D. King	B120	Conf. call w/ team to discuss status, next steps (.5), follow up w/ O'Donnell (.3)	.80
07/08/19	M. Austin	B110	Preliminary research re case law	1.40



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07/08/19	M. Austin	B110	Team discussion and phone call re next steps	.40
07/08/19	M. Austin	B110	Research re case law and out of state case law	1.50
07/08/19	M. Sekowski	B120	Telephone conf. with S. O'Donnell, S. Smith, D. King, and M. Austin re: case status and strategy.	.50
07/08/19	M. Sekowski	B120	Review additional case law for brief on motion to compel.	1.00
07/08/19	M. Sekowski	B120	Conf. with D. King re: case status and strategy.	.20
07/08/19	M. Sekowski	B120	Correspondence with S. Brauner, S. O'Donnell, and S. Smith re: committee update call.	.20
07/08/19	M. Sekowski	B120	Correspondence with S. O'Donnell re: draft letter to Judge Drain, Cyrus PR materials.	.20
07/08/19	M. Sekowski	B120	Review and analyze action plan for team call.	.20
07/08/19	S. O'Donnell	B110	Strategy call w/ team	.50
07/08/19	S. O'Donnell	B110	Pre-call w/ SS	.30
07/08/19	S. O'Donnell	B110	Pre-call w/ DK	.20
07/08/19	S. Selbst	B110	Participate in team conference call re status of MTN investigation and discovery; potential need for motion to compel.	.40
07/08/19	S. Smith	B190	T/C with S. O'Donnell re next steps and prep for team call.	.10



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07/08/19	S. Smith	B190	Follow up discussion re committee meeting and status report on MTN investigation.	.50
07/08/19	S. Smith	B190	Prepare for and participate in Herrick team call to discuss open discovery issues action plan.	.50
07/08/19	S. Smith	B110	Update action plan.	.20
07/09/19	D. King	B120	Attn to calls on discovery issues	.30
07/09/19	M. Austin	B110	Research and sheppardizing of case law	.50
07/09/19	S. O'Donnell	B120	Prep for client conference	.30
07/10/19	M. Austin	B110	Continued research re case law	4.60
07/10/19	M. Sekowski	B120	Outline motion to compel.	1.30
07/10/19	M. Sekowski	B120	Telephone conf. with S. Smith, K. Pasquale, and I. Sasson re: OZ's assertion of common interest privilege.	.50
07/10/19	M. Sekowski	B120	Telephone conf. and correspondence with S. Smith re: preparation for meet and confer with Stroock.	.30
07/10/19	M. Sekowski	B120	Review and analyze December 20 transcript re: bidding procedures.	.60
07/10/19	S. O'Donnell	B110	Meet/confer	.50
07/10/19	S. O'Donnell	B120	Doc review and claim analysis	.50
07/10/19	S. O'Donnell	B410	Due diligence	.50



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07/10/19	S. Smith	B190	Prepare email to counsel for OCO to schedule follow up meet & confer and discussions with M. Sekowski re same.	.40
07/10/19	S. Smith	B190	Prepare for and lead follow up meet & confer conference with counsel for Och-Ziff to attempt to resolve outstanding discovery disputes.	.80
07/10/19	S. Smith	B160	Exchange emails with Tyler Kim of M-III Partners re fee invoices and coordinate response with C. D'Angelo	.20
07/11/19	M. Austin	B110	Discussion with S. Smith re research; correspondence with team	.40
07/11/19	M. Austin	B110	Drafting of research memo	1.70
07/11/19	M. Sekowski	B120	Draft, review, and revise correspondence to Herrick team re: Stroock meet and confer update.	.30
07/11/19	M. Sekowski	B120	Telephone conf. and correspondence with S. Smith and S. O'Donnell re: preparation for committee call.	.20
07/11/19	M. Sekowski	B120	Draft, review, and revise talking points for committee call.	.80
07/11/19	S. Smith	B190	Review update from meet & confer conference with counsel for Och-Ziff.	.10
07/11/19	S. Smith	B190	Prepare for committee conference call and update on MTN investigation and discussions with S. O'Donnell and M. Sekowski at Herrick and S. Brauner at Akin.	1.00



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07/11/19	S. Smith	B190	Prepare and send email to counsel for OCO Capital to schedule a follow up meet & confer conference regarding OCO's assertion of the common interest privilege.	.20
07/12/19	L. Poretsky	B160	Assemble second fee statement and exhibits (.4); Meeting with Steve Smith to review second fee statement and revise fee statement and exhibits per comments (.7); breakdown block billing entries (.7); conference with billing department re invoice re-run (.3)	2.10
07/12/19	M. Sekowski	B120	Telephone conf. with Committee re: case update.	.40
07/12/19	M. Sekowski	B120	Telephone conf. with S. Smith and Quinn re: common interest privilege assertion and issues with same.	.30
07/12/19	M. Sekowski	B120	Telephone conf. with S. Smith re: OCO's proposal for potential production of common interest materials.	.20
07/12/19	M. Sekowski	B120	Telephone conf. with Akin and Herrick teams re: preparation for Committee call.	.20
07/12/19	S. O'Donnell	B110	F/up call w/ team re meet and confers	.40
07/12/19	S. O'Donnell	B310	Attend UCC call and conduct update re MTN claim analysis	.40
07/12/19	S. O'Donnell	B310	Prep for UCC call	.40



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07/12/19	S. O'Donnell	B310	Claim analysis	.40
07/12/19	S. O'Donnell	B410	Attend pre-call re UCC call	.40
07/12/19	S. Smith	B190	Review revised privilege log from OCO.	.40
07/12/19	S. Smith	B190	Prepare for and participate in follow up meet & confer conference with counsel for OCO Capital regarding disputed discovery issues.	1.00
07/12/19	S. Smith	B150	Prepare for and participate in meeting of the creditors' committee and provided the committee with an update on the status of discovery efforts in connection with the MTN investigation.	1.50
07/12/19	S. Smith	B410	T/C with Akin team to prepare for teleconference with the committee regarding the MTN investigation.	.80
07/15/19	D. King	B120	Update re: privilege claims of OCO	.60
07/15/19	L. Poretsky	B160	Revise and finalize exhibits to the fee statement (.4); Assemble second fee statement and exhibits (.2); Meeting with Steve Smith to review revised second fee statement (.4); submit same to Steve Smith for further circulation (.3); conference with Stephen Selbst to review second fee statement (.3)	1.60



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07/15/19	M. Sekowski	B120	Conf. with D. King re: OCO proposal on common interest privilege.	.20
07/15/19	M. Sekowski	B120	Telephone conf. with S. Smith re: OCO proposal on common interest privilege.	.20
07/15/19	M. Sekowski	B120	Telephone conf. with S. O'Donnell re: OCO proposal on common interest privilege, strategy for same.	.10
07/15/19	M. Sekowski	B120	Draft, review, and revise update email to S. Brauner.	.30
07/15/19	S. O'Donnell	B410	Case law analysis	.30
07/15/19	S. O'Donnell	B410	Confer w/ team re priv waiver	.20
07/15/19	S. O'Donnell	B410	Strategy and analysis re priv waiver	.20
07/15/19	S. O'Donnell	B410	Client update re priv waiver	.30
07/15/19	S. Smith	B190	(i) O/C with S. O'Donnell and M. Sekowski re status of meet & confer conference with counsel for OCO and common interest privilege and (ii) review draft update to Akin re same.	.50
07/16/19	M. Sekowski	B120	Review and analyze case law research from M. Austin.	.70
07/16/19	S. Selbst	B110	Review and revise monthly fee statement.	.40
07/16/19	S. Smith	B410	Review follow up research on case law prepared by M. Austin.	.50
07/17/19	D. King	B120	Review OCO proposal	.30



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07/17/19	M. Sekowski	B120	Review correspondence from A. Corkhill re: common interest privilege proposal.	.20
07/17/19	S. Smith	B160	Review and coordinate preparation of second consolidated monthly fee statement and share with Akin.	.50
07/17/19	S. Smith	B185	Preliminary review of joint OCO/Och-Ziff proposal to share privileged docs and t/c with M. Sekowski re same.	.20
07/18/19	M. Sekowski	B120	Review and analyze proposal from OCO and Och-Ziff and outline potential response to same.	.40
07/19/19	D. King	B120	Analyze OCO proposal re: CI docs	.70
07/19/19	L. Poretsky	B160	Review court order regarding the deadline to file objection to the fee statements and revise draft of second statement accordingly (.4); finalize same, file on a docket (.5); prepare and submit e-mail to Prime Clerk requesting service of the fee statement (.3);	1.20
07/19/19	M. Sekowski	B120	Review and analyze correspondence from D. King re: response to OCO and Och-Ziff proposal.	.20
07/19/19	S. O'Donnell	B120	Analysis re: Motion to Compel	.40
07/19/19	S. O'Donnell	B410	Doc review	.30
07/19/19	S. O'Donnell	B410	Confer w/ team	.30



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07/19/19	S. Smith	B190	Review common interest proposal from counsel for Och Ziff and OCO and O/C with D. King re same.	.40
07/19/19	S. Smith	B160	Follow up with Akin re draft second consolidated fee statement and coordinate filing of same.	.50
07/22/19	D. King	B120	Attn to proposal on CI privilege	1.10
07/22/19	M. Sekowski	B120	Correspondence with D. King and S. Smith re: response to OCO/OZ proposal on common interest privilege.	.30
07/22/19	M. Sekowski	B120	Draft response and counterproposal to OCO and OZ re: common interest privilege assertion.	1.40
07/22/19	S. O'Donnell	B190	Depo prep	1.50
07/23/19	D. King	B120	Attn to counterproposal on CI privilege issues	.40
07/23/19	M. Sekowski	B120	Correspondence with D. King and S. Smith re: response to OCO/OZ proposal on common interest issue.	.30
07/23/19	M. Sekowski	B120	Review and revise counterproposal on common interest issue.	.40
07/23/19	M. Sekowski	B120	Correspondence with S. O'Donnell re: response to OCO/OZ proposal on common interest issue.	.20
07/23/19	M. Sekowski	B120	Attention to correspondence to A. Corkhill re: counterproposal on common interest issue.	.20
07/23/19	S. O'Donnell	B110	Case admin	.20



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07/23/19	S. O'Donnell	B410	Strategy and analysis re Analysis re motion to compel	.30
07/23/19	S. Smith	B190	Review emails and analysis re common interest proposal.	.30
07/24/19	D. King	B120	Attn to counteroffer on CI information	.60
07/24/19	M. Sekowski	B120	Conf. with D. King re: OCO and OZ's response to counterproposal.	.20
07/24/19	M. Sekowski	B120	Correspondence with S. Smith, S. O'Donnell, and D. King re: committee approval of agreement with OCO and OZ on common interest issue.	.20
07/24/19	M. Sekowski	B120	Review and analyze correspondence from K. Pasquale re: OCO and OZ's response to counterproposal.	.20
07/24/19	M. Sekowski	B120	Miscellaneous correspondence with D. King and S. Smith re: OCO and OZ's response to counterproposal.	.40
07/24/19	M. Sekowski	B120	Draft response to OCO and OZ's response to counterproposal on common interest privilege.	.50
07/24/19	S. Smith	B190	(i) Attention to reply from counsel for Och-Ziff re proposal to share privileged docs, (ii) t/c with M. Sekowski re same and (iii) attention to email traffic re same.	.50
07/25/19	M. Sekowski	B120	Review and analyze new case law on common interest privilege and draft correspondence to S. Smith and M. Austin re: same.	.30



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07/25/19	M. Sekowski	B120	Review and revise response to OCO and OZ and correspondence to S. O'Donnell, D. King, and S. Smith re: same.	.40
07/25/19	M. Sekowski	B120	Telephone conf. with S. Smith re: revisions to counterproposal on common interest issue.	.10
07/25/19	S. Smith	B190	Review revisions to common interest proposal and discussions with M. Sekowski re same.	.30
07/26/19	M. Sekowski	B120	Correspondence with S. Smith re: review of response to OCO and OZ.	.10
07/29/19	M. Sekowski	B120	Miscellaneous correspondence with S. O'Donnell re: revisions to counterproposal to OCO and OZ, call.	.30
07/29/19	M. Sekowski	B120	Miscellaneous correspondence with S. Smith, K. Pasquale, and A. Corkhill re: call on counter-proposal to OCO and OZ.	.40
07/29/19	S. Smith	B190	Review emails re common interest proposal from counsel for Och Ziff and OCO capital.	.20
07/30/19	M. Sekowski	B120	Review and analyze privilege logs re: communications potentially excluded from agreement on common interest privilege.	1.50
07/31/19	M. Austin	B110	Phone call with stroock and Quinn; discussion with S. Smith	.60



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07/31/19	M. Sekowski	B120	Telephone confs. with S. Smith re: call on common interest issue, revisions to proposal on same.	.40
07/31/19	M. Sekowski	B120	Miscellaneous correspondence and telephone conf. with S. O'Donnell re: revisions to proposal on same.	.50
07/31/19	M. Sekowski	B120	Legal research re: waiver of work product doctrine.	.40
07/31/19	M. Sekowski	B120	Correspondence and telephone conf. with A. Corkhill, K. Pasquale, and S. Smith re: call on common interest issue.	.40
07/31/19	M. Sekowski	B120	Review and revise proposal on common interest issue.	.30
07/31/19	S. O'Donnell	B110	Coordinate meet and confers	.30
07/31/19	S. Smith	B190	(i) Prepare for and participate in follow up meet and confer conference with counsel for Och Ziff and counsel for OCO, (ii) t/c with M. Sekowski re common interest proposal and review and revise same.	1.00
08/01/19	M. Sekowski	B120	Telephone conf. and correspondence with S. Smith re: agreement on common interest issue and approval of same.	.30
08/01/19	M. Sekowski	B120	Draft correspondence to S. O'Donnell re: agreement on common interest issue and approval of same.	.20



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08/01/19	M. Sekowski	B120	Review correspondence from S. O'Donnell re: agreement on common interest issue.	.10
08/01/19	M. Sekowski	B120	Miscellaneous correspondence with A. Corkhill and K. Pasquale re: agreement on common interest issue.	.40
08/01/19	S. O'Donnell	B410	Confer w/ team re coordinate Analysis re motion to compel resolution	.10
08/01/19	S. O'Donnell	B110	Coordinate Analysis re motion to compel resolution motion to compel.	.20
08/01/19	S. Smith	B190	Review of follow up emails from counsel for OCO and Och-Ziff re common interest resolution.	.20
08/01/19	S. Smith	B190	Follow up review of common interest privilege resolution and review emails re same.	.20
08/02/19	M. Sekowski	B120	Correspondence with S. Smith re: review of proposal and status of same.	.10
08/02/19	S. Smith	B185	Follow up with S. O'Donnell and M. Sekowski on finalizing common interest privilege resolution.	.40
08/05/19	D. King	B120	Review emails re: proposed agreement	.40
08/05/19	M. Sekowski	B120	Telephone conf. and correspondence with S. Smith re: provision of agreement to S. Brauner.	.10



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08/05/19	M. Sekowski	B120	Conf. with S. O'Donnell and S. Smith re: provision of agreement to S. Brauner.	.10
08/05/19	S. O'Donnell	B110	Confer re discovery	.20
08/05/19	S. O'Donnell	B110	Confer w/ Carter Ledyard re MTN distribution	.30
08/05/19	S. Smith	B190	Follow up on common interest resolution.	.20
08/06/19	D. King	B120	Follow up on discovery issues	.20
08/07/19	D. King	B120	Emails re: discovery proposal	.40
08/07/19	M. Sekowski	B120	Review miscellaneous correspondence from S. Brauner and S. O'Donnell re: agreement on common interest emails.	.20
08/07/19	M. Sekowski	B120	Correspondence and telephone conf. with S. Smith re: agreement on common interest emails.	.30
08/07/19	S. O'Donnell	B110	Confer w/ Akin re Analysis re motion to compel analysis	.20
08/07/19	S. O'Donnell	B110	Coordinate Analysis re motion to compel analysis w/ Herrick team	.10
08/07/19	S. Smith	B110	T/C with J. Gadson at Carter Ledyard counsel to BNY Mellon re SRAC MTNs.	.20
08/08/19	D. King	B120	Attn to agreement re: CI documents	.20
08/08/19	M. Sekowski	B120	Review correspondence from S. Brauner and S. Smith re: common interest proposal and approval of same.	.30



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08/08/19	S. Smith	B190	Follow up on common interest resolution and send acceptance of proposal to counsel for privilege asserters.	.30
08/08/19	S. Smith	B160	Prepare and send email to Miii Partners for payment of second combined monthly fee statement.	.20
08/12/19	L. Poretsky	B160	Analyze order re procedure for interim compensation application filings; obtain form of the interim fee application and review it;	.80
08/14/19	D. King	B120	Follow up with Sekowski re: status	.20
08/14/19	L. Poretsky	B160	Review local rules re submission of the fee application and begin drafting first interim HF fee application;	3.00
08/15/19	M. Sekowski	B120	Telephone conf. with S. Smith re: common interest privilege materials and receipt of same.	.10
08/15/19	M. Sekowski	B120	Correspondence with S. Smith, K. Pasquale and A. Corkhill re: common interest privilege materials and receipt of same.	.20
08/15/19	S. Smith	B190	Exchange emails with counsel for OCO and OZ re production of common interest documents.	.30
08/16/19	D. King	B120	Follow up on status of document productions	.20
08/16/19	L. Poretsky	B160	Continue to draft first fee application	4.10



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08/20/19	M. Sekowski	B120	Correspondence with I. Sasson re: receipt of common interest materials.	.10
08/21/19	D. King	B120	Conf. w/ Sekowski re: status of doc productions/reviews	.20
08/21/19	M. Sekowski	B120	Telephone conf. with S. Smith re: common interest documents and new objection.	.20
08/21/19	S. Smith	B190	Discussions with M. Sekowski re CI doc review.	.20
08/22/19	D. King	B120	Conf. w/ Sekowski re: doc review	.20
08/22/19	L. Poretsky	B160	Continue to draft HF First Fee Application	1.20
08/22/19	M. Sekowski	B120	Correspondence with S. Smith re: review of common interest privilege materials.	.20
08/22/19	M. Sekowski	B120	Conf. with D. King re: receipt and review of common interest privilege materials.	.20
08/22/19	S. Smith	B190	T/C with M. Sekowski re CI docs and review emails re same.	.60
08/23/19	D. King	B120	Review doc production from Quinn	3.40
08/23/19	L. Poretsky	B160	Continue to draft first interim fee application;	5.00
08/23/19	M. Sekowski	B120	Correspondence with D. King re: review of common interest materials.	.10
08/26/19	D. King	B120	Review docs produced by Quinn Emanuel	2.30



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08/26/19	L. Poretsky	B160	Continue to draft first HF fee application	3.20
08/27/19	D. King	B120	Attn to document production issues	.70
08/27/19	L. Poretsky	B160	Continue to draft and revise HF Fee Application (4.0); request missing invoices and analyze them (1.2)	4.80
08/27/19	M. Sekowski	B120	Correspondence with S. O'Donnell and S. Smith re: common interest privilege analysis.	.20
08/27/19	M. Sekowski	B120	Conf. with D. King re: review of common interest privilege materials.	.20
08/27/19	S. O'Donnell	B110	Coordinate discovery	.30
08/27/19	S. Smith	B190	Discussion with S. O'Donnell and M. Sekowski re status of CI docs.	.20
08/28/19	D. King	B120	Attn to document production	.90
08/28/19	L. Poretsky	B160	Continue to draft and revise First Fee application (4.5)	3.10
08/28/19	L. Poretsky	B160	Conference with Steve Smith to discuss first fee application compensation period and third fee statement (.5); submit request for the combined invoice from June 1, 2019 through July 31, 2019 and discuss details (.4); draft third fee statement (.9)	1.80
08/29/19	D. King	B120	Review document production	1.40
08/29/19	M. Sekowski	B120	Review and analyze common interest documents.	4.30



Re: **Sears Bankruptcy**

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08/29/19	M. Sekowski	B120	Conf. with D. King re: common interest documents, case strategy.	.20
08/29/19	S. O'Donnell	B110	Coordinate depo prep	.50
08/29/19	S. Smith	B160	Discussions with L. Poretsky, paralegal, re preparation of fee statement/interim application and review fee order re same.	.90
Total				\$119,650.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
S. O'Donnell	16.90	985.00	16,646.50
S. Selbst	.80	975.00	780.00
D. King	20.30	875.00	17,762.50
S. Smith	49.20	725.00	35,670.00
M. Sekowski	43.30	675.00	29,227.50
M. Austin	16.00	370.00	5,920.00
L. Poretsky	36.70	360.00	13,212.00
H. Velastiegui	.80	360.00	288.00
S. Yanway	.40	360.00	144.00



Re: **Sears Bankruptcy**

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DISBURSEMENTS

Online Research	242.64
Pacer Charges	12.20
Duplication	72.72
E-Discovery Data Hosting	300.00
Total disbursements	<hr/> \$627.56



Re: **Sears Bankruptcy**

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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Case Administration - B110</u>		
	25.60	\$14,374.00
Subtotals	25.60	\$14,374.00

<u>Asset Analysis and Recovery - B120</u>		
	64.40	\$47,866.00
Subtotals	64.40	\$47,866.00

<u>Relief from Stay/Adequate Protection - B140</u>		
	.40	\$394.00
Subtotals	.40	\$394.00

<u>Meetings of & Communications w/Creditors - B150</u>		
	1.50	\$1,087.50
Subtotals	1.50	\$1,087.50

<u>Fee/Employment Applications - B160</u>		
	41.10	\$16,402.00



Re: **Sears Bankruptcy**

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Subtotals	41.10	\$16,402.00
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Assumption/Rejection of Leases/Contracts - B185

	.60	\$435.00
Subtotals	.60	\$435.00

Contested Matters (exclu. assumption/rejection) - B190

	41.00	\$30,115.00
Subtotals	41.00	\$30,115.00

Claims Administration & Objections - B310

	1.20	\$1,182.00
Subtotals	1.20	\$1,182.00

Plan & Disclosure Statements (Business Plan) - B320

	1.30	\$942.50
Subtotals	1.30	\$942.50

General Bankruptcy Advice/Opinions - B410

	7.30	\$6,852.50
Subtotals	7.30	\$6,852.50



Re: **Sears Bankruptcy**

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FEDERAL ID: 13-2991662

Simon Property Group, L.P.
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

November 18, 2019
Bill Number: 348033
File Number: 19609-0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through October 31, 2019	\$87,411.50
Expenses posted through October 31, 2019	253.82
TOTAL	\$87,665.32

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



Re: **Sears Bankruptcy**

Bill Number: 348033
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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
09/03/19	C. Carty	B110	Analyze issues related to potential conflict re Cyrus and draft e-mail re same.	1.10
09/03/19	D. King	B120	Review CI document production, conf. w/ Sekowski re: same	2.60
09/03/19	L. Poretsky	B160	Discuss with Steve Smith status of the third fee statement and first fee application (.4); continue to draft and revise third fee statement and first fee application (1.4)	1.80
09/04/19	D. King	B120	Update O'Donnell re: status, emails re: same (.4); Confer w. S. Smith, M. Sekowski re: next steps (.4); review CI documents (1.3)	2.10
09/04/19	M. Sekowski	B120	Conf. with D. King and S. Smith re: analysis of common interest materials and strategy for same.	.20
09/04/19	S. O'Donnell	B110	Coordinate motion to compel	.20
09/04/19	S. O'Donnell	B110	Conflict clearance	.20
09/04/19	S. O'Donnell	B410	Doc review re priv papers	.90
09/04/19	S. O'Donnell	B410	Update to Akin	.20
09/04/19	S. Smith	B190	O/C with D. King and M. Sekowski re CI docs and next steps.	.20
09/05/19	D. King	B120	Review CI documents in preparation for team call re: same (3.0); emails re: CI documents, next steps	3.20



Re: **Sears Bankruptcy**

Bill Number: 348033
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09/05/19	L. Poretsky	B160	Follow up on a status of the July bill; continue to draft first fee application	1.20
09/05/19	S. O'Donnell	B110	Coordinate conflict clearance w/ Cyrus re Carty	.50
09/05/19	S. O'Donnell	B410	Coordinate Motion To Compel analysis and depo strategies	.50
09/05/19	S. Smith	B190	Review of CI docs and discussions with D. King and M. Sekowski re same.	.80
09/06/19	D. King	B120	Review CI docs, files re: original auction events	.80
09/06/19	S. Smith	B190	Review hard copies of docs produced by Stroock and Quinn.	1.00
09/09/19	C. Carty	B110	Review and analyze background materials related to investigation.	1.50
09/09/19	D. King	B120	Prepare for CI meeting w/ O'Donnell	1.90
09/09/19	S. Smith	B190	Review hard copies of documents produced by Quinn and Stroock and prepare timeline re same.	2.00
09/10/19	C. Carty	B110	Meet with Sears team regarding investigation status; review background materials.	1.50
09/10/19	D. King	B120	Conf. call w. S. Smith to go over CI document issues (.6); Prepare for call w/ S. O'Donnell, call on CI document issues (.6)	1.20
09/10/19	M. Sekowski	B110	Conf. with D. King re: common interest analysis and case strategy.	.20



Re: **Sears Bankruptcy**

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09/10/19	S. O'Donnell	B410	Strategy and analysis and team meeting re Motion To Compel and depos	1.50
09/10/19	S. O'Donnell	B410	Plan and prepare for strategy and analysis and team meeting re Motion To Compel and depos	.50
09/10/19	S. Smith	B190	(i) Review hard copies of documents produced by Stroock and Quin, (ii) T/C with D. King re doc review and analysis and (iii) O/C with S. O'Donnell and D. King.	3.00
09/12/19	S. O'Donnell	B110	Coordinate Motion To Compel	.50
09/13/19	D. King	B120	Emails re: call w/ Consortium lawyers	.30
09/13/19	M. Sekowski	B120	Review correspondence from S. Smith re: draft correspondence to counsel for OCO and OZ on common interest issue.	.10
09/13/19	S. O'Donnell	B410	Meet and confer re: Motion To Compel	.20
09/13/19	S. O'Donnell	B410	Motion To Compel	.30
09/13/19	S. Smith	B190	(i) Prepare email for counsel to OCO and OZ re meet and confer and (ii) discussions with D. King re same.	.50
09/16/19	D. King	B120	Attn to CI document dispute	.70
09/16/19	M. Sekowski	B120	Attention to transmission of correspondence to K. Pasquale and A. Corkhill re: continued meet and confer.	.10



Re: **Sears Bankruptcy**

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09/16/19	M. Sekowski	B120	Miscellaneous correspondence with K. Pasquale, S. Smith, and D. King re: continued meet and confer.	.20
09/16/19	M. Sekowski	B120	Correspondence and conf. with D. King and S. Smith re: common interest analysis and continued meet and confer.	.20
09/16/19	S. Smith	B190	Follow up review of meet and confer request and exchange emails with D. King and M. Sekowski re same.	.50
09/17/19	D. King	B120	Attn to CI document dispute	.30
09/17/19	L. Poretsky	B160	Conference with Steve Smith to strategies regarding filing of the third combined fee statement and fee application (.4); request and analyze drafts of the June and July invoices and submit to Steve Smith for review and approval (.5)	.90
09/17/19	M. Sekowski	B120	Correspondence with S. Smith and D. King re: preparation for upcoming meet and confer.	.10
09/17/19	S. Smith	B190	Exchange emails with D. King and M. Sekowski re follow up meet & confer with counsel for OCO and OZ.	.10
09/18/19	D. King	B120	Prep for, participate on meet and confer call re: CI docs (.9); attn to identifying CI docs in dispute (1.2)	2.10
09/18/19	M. Sekowski	B110	Telephone confs. with D. King and S. Smith re: common interest dispute and strategy for same.	.30



Re: **Sears Bankruptcy**

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09/18/19	M. Sekowski	B110	Telephone conf. with counsel for OCO and OZ re: common interest dispute.	.30
09/18/19	S. O'Donnell	B410	Coordinate meet and confer re: commpn interst dispute.	.50
09/18/19	S. Smith	B190	(i) Prepare for and lead meet & confer conference with counsel for OCO and OZ and (ii) follow up T.C with Herrick team re next steps.	1.00
09/19/19	D. King	B120	Review Quinn and Stroock CI docs to prepare final demand re: production	2.30
09/19/19	S. Smith	B110	Follow up emails with E. Reimer at Milbank, counsel for Cyrus, re conflict discussion.	.20
09/20/19	D. King	B120	Draft email to Stroock and Quinn re: CI documents	1.90
09/20/19	L. Poretsky	B160	Analyze S. Smith revisions to June and July invoices and revise my time accordingly (.6); submit to billing department to finalize invoices (.2)	.80
09/20/19	M. Sekowski	B110	Miscellaneous correspondence with S. King and S. Smith re: common interest documents and correspondence to OCO and OZ.	.20
09/20/19	M. Sekowski	B110	Review miscellaneous correspondence from A. Corkill, K. Pasquale, and S. O'Donnell re: response on common interest document proposal.	.20



Re: **Sears Bankruptcy**

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09/20/19	S. Smith	B190	(i) T/C with E. Reimer at Milbank re conflict and questions re document production and (ii) circulate update email to Herrick team re same.	.50
09/20/19	S. Smith	B190	Finalize and send out email to counsel for OCO and Och Ziff re production of requested CI docs.	.50
09/20/19	S. Smith	B190	Follow up T/C with counsel for Cyrus re conflict and send email to Herrick team re same.	.20
09/23/19	C. Carty	B120	Review and analyze prior work product related to Sears investigation.	1.20
09/23/19	D. King	B120	Follow up re: CI doc proposals (.6); conf. w/ O'Donnell and Carty to discuss claims (.4); emails w/ team re: Carty (.2)	1.20
09/23/19	L. Poretsky	B160	Follow up on a status of the invoice for the period from June 1, 2019 through August 31, 2019 (.2); revise third combined fee statement (.5)	.70
09/23/19	M. Sekowski	B120	Correspondence with D. King and S. O'Donnell re: materials for C. Carty.	.10
09/23/19	M. Sekowski	B120	Telephone conf. and correspondence with S. Smith re: materials for C. Carty.	.20
09/23/19	M. Sekowski	B120	Correspondence with S. Smith and C. Carty re: background materials.	.20



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09/23/19	S. O'Donnell	B110	Coordinate discovery and Motion To Compel common interest dispute	.40
09/23/19	S. O'Donnell	B110	Confer w/ team re discovery and Motion To Compel common interest dispute	.40
09/23/19	S. O'Donnell	B410	Doc review re discovery and Motion To Compel common interest dispute	.30
09/23/19	S. Smith	B190	Prepare materials for Chris Carty and t/c with M. Sekowski re same.	.50
09/23/19	S. Smith	B190	Update timeline based upon review of CI docs.	2.00
09/24/19	D. King	B120	Follow up re: Carty/conflict issue with Cyrus.	.30
09/24/19	M. Sekowski	B120	Correspondence with D. King re: background materials.	.10
09/24/19	S. Smith	B160	Coordinate preparation of third consolidated monthly fee statement.	.30
09/25/19	S. O'Donnell	B410	Confer w/ team re proffer and dep and Motion To Compel common interest dispute coordination	.50
09/26/19	L. Poretsky	B160	Follow up on a status of the invoices in connection to the third fee statement	.40
09/27/19	M. Sekowski	B120	Review correspondence from K. Pasquale re: common interest materials.	.10



Re: **Sears Bankruptcy**

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09/27/19	S. Smith	B190	Review of email response from counsel to Och Ziff re production of CI docs and related analysis.	.50
09/27/19	S. Smith	B190	Follow up revisions to timeline based upon doc production.	.50
09/30/19	C. Carty	B120	Review and analyze background materials and other documents in connection with Rule 2004 investigation.	2.40
10/01/19	C. Carty	B120	Review and analyze documents produced in connection with Rule 2004 investigation.	4.80
10/02/19	C. Carty	B120	Review and analyze documents produced in connection with Rule 2004 investigation.	4.10
10/02/19	L. Poretsky	B160	Review and analyze finalized bill fro July and August and submit request to billing department for combined June, July and August bill	.50
10/03/19	C. Carty	B120	Review and analyze documents produced in connection with Rule 2004 investigation.	3.10
10/03/19	C. Carty	B120	Draft issues outline related to Rule 2004 investigation.	1.20
10/03/19	D. King	B110	Follow up re: CI document issues	.40
10/03/19	M. Sekowski	B120	Correspondence with S. Smith and D. King re: response to OCO and OZ on common interest.	.20



Re: **Sears Bankruptcy**

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10/04/19	C. Carty	B120	Review and analyze documents produced in connection with Rule 2004 investigation.	2.30
10/04/19	C. Carty	B120	Draft issues outline related to Rule 2004 investigation.	2.50
10/04/19	S. Smith	B190	(i) Analysis of document production and (ii) attention to and review of email from counsel for OCO and Och Ziff re document production.	1.50
10/07/19	C. Carty	B120	Review and analyze documents produced in connection with Rule 2004 investigation.	2.20
10/07/19	C. Carty	B120	Review and analyze case filings regarding MTN sale.	1.30
10/07/19	D. King	B120	Emails re: next steps	.30
10/07/19	L. Poretsky	B160	Review and analyze HF combined invoice for the period June 1 through August 31, 2019; continue to draft third combined fee statement; request itemized expenses report for the same period.	1.70
10/07/19	M. Sekowski	B120	Review correspondence from S. Smith re: common interest proposal and documents on de-risking transactions.	.10
10/08/19	C. Carty	B120	Review and analyze documents produced in connection with Rule 2004 investigation.	3.10



Re: **Sears Bankruptcy**

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10/08/19	C. Carty	B120	Research case law related to issues involved in Rule 2004 investigation.	2.10
10/08/19	L. Poretsky	B160	Review and analyze chart of itemized disbursements for the June, July and August and update exhibits to third fee statement	.70
10/09/19	C. Carty	B120	Review and analyze documents produced in connection with Rule 2004 investigation.	1.80
10/09/19	C. Carty	B120	Research legal issues related to Rule 2004 investigation.	1.30
10/09/19	M. Sekowski	B120	Review correspondence from E. Hess re: additional production on de-risking transactions.	.20
10/09/19	M. Sekowski	B120	Correspondence with litigation support re: additional production on de-risking transactions.	.20
10/10/19	C. Carty	B120	Review and analyze documents produced in connection with Rule 2004 investigation.	1.70
10/10/19	C. Carty	B120	Analyze investigation strategy and draft issues outline.	2.10
10/10/19	D. King	B120	Follow up re: supplemental document productions	.30
10/10/19	M. Sekowski	B120	Correspondence with D. King and S. Smith re: additional production.	.10
10/10/19	M. Sekowski	B120	Correspondence with litigation support personal re: additional production and issues with same.	.20



Re: **Sears Bankruptcy**

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10/10/19	S. Smith	B190	Review new document production from OCO.	.80
10/11/19	A. DeLeon	B110	Analyze adversary/third party document production.	.70
10/11/19	C. Carty	B120	Analyze investigation strategy and draft issues outline.	2.50
10/11/19	C. Carty	B120	Review and analyze documents produced in connection with Rule 2004 investigation.	.70
10/11/19	M. Sekowski	B120	Review correspondence from I. Sasson re: additional production.	.10
10/11/19	M. Sekowski	B120	Review correspondence from S. Smith and A. DeLeon re: additional production.	.10
10/11/19	S. Smith	B190	Follow up review of OCO production and review of OZ additional productions.	.50
10/14/19	C. Carty	B120	Review and analyze documents produced in Rule 2004 investigation; draft issues outline for deposition discovery.	3.80
10/14/19	D. King	B120	Attn to team planning for next steps in discovery	.30
10/14/19	M. Sekowski	B120	Correspondence with D. King and C. Carty re: case status.	.10
10/16/19	C. Carty	B120	Call with litigation team regarding status of Rule 2004 investigation.	.60
10/16/19	C. Carty	B120	Draft issues outline for deposition discovery.	2.20



Re: **Sears Bankruptcy**

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10/16/19	D. King	B120	Conf. call w/ Carty, Smith and Sekowski to discuss next steps; follow up on next steps w/ Carty and Smith	.80
10/16/19	M. Sekowski	B120	Telephone conf. with D. King, C. Carty, and S. Smith re: case status and strategy.	.60
10/16/19	M. Sekowski	B130	Review file re: potential deponents.	.20
10/16/19	S. O'Donnell	B120	Depo prep	.50
10/16/19	S. Smith	B190	T/C with D. King, M. Sekowski and C. Carty re status and next steps.	.60
10/17/19	D. King	B120	Follow up re: next steps w/ discovery	.30
10/17/19	M. Sekowski	B120	Review correspondence from D. King and C. Carty re: case strategy.	.10
10/17/19	S. Smith	B160	Prepare fee estimate for professional fee committee.	.30
10/17/19	S. Smith	B185	(i) Review follow up production, (ii) O/C with S. O'Donnell and C. Carty re status and research and (iii) attention to email traffic from C. Carty re same.	1.30
10/21/19	C. Carty	B120	Analyze issues related to Rule 2004 investigation and draft issues outline.	2.20
10/23/19	C. Carty	B120	Analyze issues related to Rule 2004 investigation and draft issues outline.	3.70



Re: **Sears Bankruptcy**

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10/23/19	S. Smith	B190	Review of and revisions to timeline and follow up review of docs re same.	1.00
10/23/19	S. Smith	B150	Exchange emails with Akin Gump re Committee review of consolidated fee statement and follow up review of and revisions to same.	.30
10/24/19	C. Carty	B120	Analyze issues related to Rule 2004 investigation and draft issues outline.	3.40
10/24/19	S. Smith	B190	Analysis re CDS market and depo prep.	.70
Total				\$87,411.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
S. O'Donnell	8.10	985.00	7,978.50
D. King	23.30	875.00	20,387.50
S. Smith	21.30	725.00	15,442.50
M. Sekowski	5.00	675.00	3,375.00
C. Carty	60.40	610.00	36,844.00
L. Poretsky	8.70	360.00	3,132.00
A. DeLeon	.70	360.00	252.00



Re: **Sears Bankruptcy**

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DISBURSEMENTS

Duplication	53.82
E-Discovery Data Hosting	200.00
Total disbursements	<hr/> \$253.82



Re: **Sears Bankruptcy**

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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Case Administration - B110</u>		
	8.80	\$6,225.00
Subtotals	8.80	\$6,225.00

<u>Asset Analysis and Recovery - B120</u>		
	83.30	\$57,303.00
Subtotals	83.30	\$57,303.00

<u>Asset Deposition - B130</u>		
	.20	\$135.00
Subtotals	.20	\$135.00

<u>Meetings of & Communications w/Creditors - B150</u>		
	.30	\$217.50
Subtotals	.30	\$217.50

<u>Fee/Employment Applications - B160</u>		
	9.30	\$3,567.00



Re: **Sears Bankruptcy**

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Subtotals	9.30	\$3,567.00
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Assumption/Rejection of Leases/Contracts - B185

	1.30	\$942.50
Subtotals	1.30	\$942.50

Contested Matters (exclu. assumption/rejection) - B190

	18.90	\$13,702.50
Subtotals	18.90	\$13,702.50

General Bankruptcy Advice/Opinions - B410

	5.40	\$5,319.00
Subtotals	5.40	\$5,319.00



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

March 13, 2020
Bill Number: 352221
File Number: 19609-0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through February 29, 2020	\$138,438.00
Expenses posted through February 29, 2020	2,170.66
TOTAL	\$140,608.66

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 16165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



Re: **Sears Bankruptcy**

Bill Number: 352221
File Number: 19609-0001
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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
11/01/19	S. Smith	B190	Review of and revisions to timeline for depo outline.	.70
11/05/19	S. Smith	B160	Coordinate prep and sharing of weekly accruals to M-III.	.20
11/06/19	S. Smith	B190	(i) Preliminary review of draft complaint and presentation to Litigation Designees and (ii) o/c with C. Carty re same.	1.50
11/08/19	L. Poretsky	B160	Review and analyze Confirmation Order for fee statements and see applications provisions and search docket or Notice of Effective Date; e-mail provisions to Steve Smith for review;	1.30
11/08/19	S. Smith	B160	Review Confirmation Order fee procedure and exchange emails with L. Poretsky re same.	.40
11/11/19	L. Poretsky	B160	Working with billing department to revise the time entries per Steve Smith comments (.6); update draft of the third fee statement (.4)	1.00
11/11/19	S. Smith	B190	Review of executed protective orders and exchange emails with C. Carty re same.	.70
11/11/19	S. Smith	B160	Review of and revisions to draft consolidated fee statement and exchange emails with paralegal re same.	.50



Re: **Sears Bankruptcy**

Bill Number: 352221
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11/12/19	L. Poretsky	B160	Draft and submit e-mail to PrimeClerk re service of third fee statement	.30
11/12/19	L. Poretsky	B160	Revise and finalize third fee statement, compile exhibits	.50
11/12/19	L. Poretsky	B160	Meeting with Steve Smith and Stephen Selbst for final review of the third fee statement	.50
11/12/19	L. Poretsky	B160	Request combined invoice for September and October for the fourth fee statement;	.30
11/12/19	L. Poretsky	B160	Prepare for filing and e-file third fee statement	.30
11/12/19	L. Poretsky	B160	Review and analyze revise combined invoice in support of third fee statement to ensure accuracy;	.30
11/12/19	S. Smith	B160	O/C with S. O'Donnell and L. Poretsky re third combined fee statement and fourth fee statement and fee app prep.	1.00
11/12/19	S. Smith	B160	Review fee order and draft combined monthly fee statement.	.30
11/14/19	L. Poretsky	B160	Follow up on a status of the final invoices for September and October for the fourth combined fee statement;	.30
11/14/19	L. Poretsky	B160	Draft fourth combine fee statement	.60
11/14/19	S. Smith	B160	Discussion re prep of fourth fee statement and coordinate prep re same.	.30



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11/18/19	L. Poretsky	B160	Continue to draft fourth combined fee statement (September -October 2019)	.80
11/18/19	S. Smith	B190	Further review of revised complaint against Cyrus among others.	1.40
11/19/19	L. Poretsky	B160	Follow up on a status of the combined September and October invoice	.20
11/19/19	L. Poretsky	B160	Continue to draft combined fourth fee statement	.50
11/20/19	L. Poretsky	B160	Update draft of the fourth fee statement based on the invoice	1.30
11/20/19	L. Poretsky	B160	Request missing documents from accounting (.3)	.10
11/20/19	L. Poretsky	B160	Assemble exhibits to fourth fee statement	.40
11/20/19	L. Poretsky	B160	Review and analyze combined invoice for forth fee statement	.70
11/20/19	S. Smith	B160	Coordinate prep of fourth fee statement with L. Poretsky and review same.	.30
11/21/19	L. Poretsky	B160	Revise draft of the fourth fee statement based on the revised invoice and submit to Steve Smith for review	1.20
11/21/19	L. Poretsky	B160	Review and analyze revised combine invoice for forth fee statement (.7)	.50
11/21/19	S. Smith	B160	Review draft fourth fee statement and discussion with L. Poretsky re same.	.40



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11/22/19	S. Smith	B190	Review revised complaint and presentation to trust designees re estate claims.	.70
11/25/19	L. Poretsky	B160	Revise fourth fee statement and exhibits per Steve Smith comments and circulate for review	.70
11/25/19	S. Smith	B160	Review further revised fourth fee statement.	.30
12/02/19	L. Poretsky	B160	Review the docket and Prime Clerk website to find out if there's been a notice of effective date filed and whether other firms have begun to file their final fee applications.	.20
12/02/19	S. Smith	B160	Review docket and plan re final fee apps and exchange emails with paralegal, L. Poretsky, re same.	.50
12/03/19	L. Poretsky	B160	Conference with Steve Smith to discuss finalizing and filing of fourth combined fee statement and service thereof and service of papers and circulate draft and exhibits	.40
12/03/19	S. Smith	B160	Coordinate prep, review and filing of fourth fee statement and exchange emails with S. Brauner at Akin re same.	.40
12/09/19	S. Smith	B160	Review, revise and coordinate filing of fourth fee statement and discussions with paralegal re same.	.90
12/11/19	S. Smith	B160	Finalize and coordinate filing of fourth fee statement.	.60



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12/12/19	L. Poretsky	B160	Following up on a status of the Fourth Fee Statement	.20
12/12/19	S. Smith	B190	(i) Conduct follow up research related to collusion, (ii) follow up review of produced documents, and (iii) litigation analysis.	2.50
12/16/19	S. Smith	B190	Follow up analysis re depo prep.	.90
12/26/19	S. Smith	B160	Coordinate preparation of invoice and payments details on latest fee statement and exchange emails with Mary at MIII Partners re same.	.40
12/27/19	S. Smith	B160	Follow up with Sears Professional Fee Invoices Committee re latest fee statement.	.20
01/02/20	C. Carty	B190	Confer with consultants re investigation.	.40
01/02/20	S. O'Donnell	B190	Expert retention with regard to depo prep	.50
01/07/20	C. Carty	B190	Call with financial consultants re investigation.	.60
01/09/20	C. Carty	B190	Draft memo re Sears investigation background and analyze.	2.50
01/09/20	G. Fromer	B190	Communicate with partner about research assignment via detailed email about background and next steps	.20
01/09/20	K. Kolb	B190	Analyze background motion papers for Rule 2004 investigation	2.80



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01/09/20	S. Smith	B160	Coordinate sharing of accruals with M-III and discussion with C. D'Angelo re same.	.20
01/10/20	C. Carty	B190	Call with K. Kolb and G. Fromer re Sears investigation.	.40
01/10/20	G. Fromer	B190	Review background materials and prepared timeline of events prior to Dec. 20, 2018 hearing	3.70
01/10/20	G. Fromer	B190	Meet with team to discuss strategy and next steps	.30
01/10/20	K. Kolb	B190	Call with C. Carty and G. Fromer regarding Rule 2004 investigation into MTN notes	.40
01/10/20	K. Kolb	B190	Analyze documents produced by CDS participants	1.40
01/13/20	G. Fromer	B190	Review and made track changes to timeline of events	1.40
01/13/20	G. Fromer	B190	Review background materials and compiled timeline of important events	2.30
01/13/20	K. Kolb	B190	Revise case timeline	.40
01/14/20	G. Fromer	B190	Review background materials and prepared timeline of events	.30
01/14/20	K. Kolb	B190	Further revisions to case timeline	.30
01/15/20	G. Fromer	B190	Review background materials and compiled timeline of important events	2.00
01/15/20	G. Fromer	B190	Meeting to discuss document review and research assignments	.20
01/15/20	G. Fromer	B190	Conduct legal research	1.20



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01/15/20	K. Kolb	B190	Discuss research with M. Fromer	.20
01/15/20	K. Kolb	B190	Meet with M. Austin and G. Fromer regarding prior research	.20
01/15/20	K. Kolb	B190	Discuss case background and strategy with S. Smith	.30
01/15/20	S. Smith	B110	O/C with K. Kolb re research and background.	.30
01/16/20	C. Carty	B190	Review and analyze work product regarding Rule 2004 investigation.	1.50
01/16/20	G. Fromer	B190	Implement revisions to legal memorandum	2.00
01/16/20	G. Fromer	B190	Conduct legal research and drafted memorandum	2.80
01/16/20	G. Fromer	B190	Review track changes and made edits to timeline of events	.90
01/16/20	K. Kolb	B190	Review and revise research memo into Section 363(n) case law	1.70
01/16/20	K. Kolb	B190	Revise timeline	.80
01/16/20	L. Poretsky	B160	Search prime clerk's docket for filed notice of effective date in connection with final fee application per Steve Smith request;	.30
01/17/20	G. Fromer	B190	Spoke with counsel about edits to legal memorandum on Section 363(n) issues	.30
01/17/20	G. Fromer	B190	Conduct legal research for legal memorandum on Section 363(n) issues	.90



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01/17/20	G. Fromer	B190	Meeting about case strategy and status update	.50
01/17/20	G. Fromer	B190	Implement revisions to legal memorandum on Section 363(n) issues	1.40
01/17/20	K. Kolb	B190	Call with S. O'Donnell, C. Carty, and G. Fromer regarding legal research update and deposition strategy	.50
01/17/20	K. Kolb	B190	Review section 363(n) case law and revise memo	4.60
01/18/20	K. Kolb	B190	Further revisions to memo summarizing research into 363(n) claims	.70
01/21/20	C. Carty	B190	Review and analyze research and case law related to potential claims.	2.10
01/21/20	G. Fromer	B190	Spoke with counsel about new research and new document review assignments	.20
01/21/20	G. Fromer	B190	Conducted legal research on Section 363(n) damages actions	2.40
01/21/20	G. Fromer	B190	Edit and update summary of research re: Section 363(n) damages claims	.90
01/21/20	K. Kolb	B190	Research into 363(n) claims and related causes of action	2.30
01/21/20	K. Kolb	B190	Review ISDA decision and supporting papers in connection with investigation background	.30



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01/21/20	K. Kolb	B190	Analyze documents produced by CDS participants in connection with deposition preparation	2.00
01/21/20	K. Kolb	B190	Analyze order confirming plan of reorganization	.30
01/21/20	K. Kolb	B190	Revise email regarding research regarding claims analysis	.60
01/21/20	K. Kolb	B190	Meet with L. Schepp regarding timeline and deposition prep	.20
01/21/20	K. Kolb	B190	Discuss research and review with G. Fromer	.20
01/21/20	L. Schepp	B110	Reviewing/Editing/Drafting Documents to compile timeline per K. Kolb.	2.40
01/22/20	C. Carty	B190	Participate in team meeting re potential claims and prepare for same.	1.00
01/22/20	C. Carty	B190	Review and analyze research memo related to potential claims.	1.10
01/22/20	G. Fromer	B190	Discuss Section 363(n) issue via email and compiled relevant case law in preparation for meeting	.80
01/22/20	G. Fromer	B190	Conducted document review	2.40
01/22/20	G. Fromer	B190	Further research on potential claims	1.00
01/22/20	G. Fromer	B190	Review memorandum on assessment of claims and notes on document production in preparation to conduct further document review	.30
01/22/20	K. Kolb	B190	Analyze plan of reorganization	1.50



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01/22/20	K. Kolb	B190	Analyze prior research regarding potential claims	.30
01/22/20	K. Kolb	B190	Analyze relevant documents in connection with claims analysis and deposition prep	1.70
01/22/20	K. Kolb	B190	Attend team meeting regarding research update and claims analysis	.90
01/22/20	L. Schepp	B110	Reviewing/Editing/Drafting Documents to compile timeline per K. Kolb.	1.70
01/22/20	S. O'Donnell	B190	363n and case law analysis	.50
01/22/20	S. O'Donnell	B190	Case w/ team re 363n and case law analysis	.50
01/22/20	S. Smith	B190	Follow up review of claims and exchange emails with K. Kolb re same.	.30
01/22/20	S. Smith	B190	Prepare for and participate in O/C with team re status and next steps.	1.20
01/23/20	G. Fromer	B190	Spoke with counsel about legal research memorandum objectives	.10
01/23/20	G. Fromer	B190	Conducted legal research on potential claims	3.00
01/23/20	K. Kolb	B190	Draft memo analyzing potential claims	8.40
01/23/20	K. Kolb	B190	Review and incorporate research from G. Fromer into memo	.50
01/23/20	K. Kolb	B190	Analyze responsive documents in connection with deposition prep	2.10
01/23/20	L. Schepp	B110	Compile Quinn and Stroock documents for review, per K. Kolb.	1.00



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01/24/20	G. Fromer	B190	Spoke with counsel about creating chronology of relevant documents	.60
01/24/20	G. Fromer	B190	Conduct legal research on damages under 363(n) claims	1.50
01/24/20	G. Fromer	B190	Edit legal memorandum on potential claims	1.10
01/24/20	K. Kolb	B190	Discuss additional research with G. Fromer	.10
01/24/20	K. Kolb	B190	Meeting with G. Fromer and L. Schepp regarding case chronology and related documents	.30
01/24/20	K. Kolb	B190	Draft and revise memo summarizing background facts and analyzing potential claims	3.50
01/24/20	L. Schepp	B110	Reviewing/Editing/Drafting documents to compile timeline per K. Kolb.	1.10
01/28/20	C. Carty	B190	Review and analyze memorandum regarding investigation.	.70
01/28/20	C. Carty	B190	Meet with S. O'Donnell, K. Kolb, and G. Fromer re Rule 2004 investigation and prepare for same.	1.00
01/28/20	G. Fromer	B190	Conduct legal research remedy issues	.40
01/28/20	G. Fromer	B190	Discuss potential claims and defenses and strategy	1.30
01/28/20	G. Fromer	B190	Discuss document review objectives and building chronology of relevant documents	.90
01/28/20	G. Fromer	B190	Review documents for relevance	3.90



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01/28/20	K. Kolb	B190	Discuss factual and legal research items pending with G. Fromer	.20
01/28/20	K. Kolb	B190	Meeting regarding factual and legal analysis of potential claims and discovery plan	1.10
01/28/20	K. Kolb	B190	Discuss document review issues with G. Fromer and L. Schepp	.20
01/28/20	K. Kolb	B190	Research aspects of the CDS market	.40
01/28/20	K. Kolb	B190	Revise memo to send to expert and analyze protective order in connection with these revisions	.60
01/28/20	K. Kolb	B190	Analyze correspondence regarding prior meet and confer sessions	.50
01/28/20	K. Kolb	B190	Analyze privilege logs produced in investigation	.80
01/28/20	L. Schepp	B110	Reviewing/Editing/Drafting documents to compile timeline per K. Kolb.	6.00
01/28/20	L. Schepp	B110	Reviewing/Editing/Drafting Documents relating to Quinn and Stroock privilege documents, per K. Kolb.	3.00
01/28/20	S. O'Donnell	B190	Team meeting confer w/ Stroock re misc. matters	1.50
01/28/20	S. O'Donnell	B190	Confer w/ team re meeting w/ Stroock re misc. matters	.30
01/29/20	C. Carty	B190	Analyze issues related to Rule 2004 investigation and factual analysis of same.	1.20



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01/29/20	G. Fromer	B190	Conduct review for relevant documents	6.40
01/29/20	K. Kolb	B190	Call with potential expert regarding engagement	.10
01/29/20	K. Kolb	B190	Research potential experts	.50
01/29/20	K. Kolb	B190	Research re market collusion	2.20
01/29/20	K. Kolb	B190	Analyze documents produced by CDS Participants	2.00
01/29/20	L. Schepp	B110	Reviewing/Editing/Drafting Documents to update timeline, per K. Kolb	4.80
01/30/20	C. Carty	B190	Analyze documents produced in Rule 2004 investigation and memorandum re same.	1.10
01/30/20	G. Fromer	B190	Review documents produced by Omega for relevance	.40
01/30/20	G. Fromer	B190	Discuss case strategy	.20
01/30/20	K. Kolb	B190	Analyze scope of releases under APA	.20
01/30/20	K. Kolb	B190	Team call	.20
01/30/20	K. Kolb	B190	Research potential advisors	.80
01/30/20	K. Kolb	B190	Further analysis of case law regarding 363(n) claims	.40
01/30/20	K. Kolb	B190	Conduct legal and fact research re market collusion	3.50
01/30/20	K. Kolb	B190	Revise claims analysis memo	1.70
01/30/20	K. Kolb	B190	Analyze summary of key documents by G. Fromer	.30



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01/30/20	L. Schepp	B110	Reviewing/Editing/Drafting Documents to update timeline, per K. Kolb	8.90
01/30/20	S. O'Donnell	B190	Confer re experts	.50
01/31/20	G. Fromer	B190	Discuss CDS exposure	.10
01/31/20	K. Kolb	B190	Calls with potential experts	.50
01/31/20	K. Kolb	B190	Revise memo	3.00
01/31/20	L. Schepp	B110	Reviewing/Editing/Drafting Documents related to chronology, per K. Kolb.	5.20
02/03/20	K. Kolb	B190	Call with potential expert	.50
02/03/20	K. Kolb	B190	Legal research into potential claims	.80
02/03/20	K. Kolb	B190	Analyze Deloitte documents in connection with potential custodians	1.30
02/03/20	K. Kolb	B190	Revise chronology and fact memo	3.40
02/04/20	G. Fromer	B190	Conduct research on credit default swap auctions	1.50
02/04/20	G. Fromer	B190	Discuss expert due diligence	.20
02/04/20	G. Fromer	B190	Spoke with potential expert	.20
02/04/20	K. Kolb	B190	Analyze expert CVs	.50
02/04/20	K. Kolb	B190	Calls with potential experts	.70
02/05/20	G. Fromer	B190	Conduct research on potential experts	.80
02/05/20	K. Kolb	B190	Revise chron	.90
02/05/20	K. Kolb	B190	Discuss prior meet and confers with M. Sekowski	.20



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02/05/20	K. Kolb	B190	Research potential expert	.20
02/06/20	G. Fromer	B190	Research damages for fraud on the court claim	.50
02/06/20	G. Fromer	B190	Update damages section of legal memorandum on potential claims	.20
02/06/20	K. Kolb	B190	Analyze and revise document chronology	3.30
02/06/20	K. Kolb	B190	Analyze privilege logs	.40
02/07/20	K. Kolb	B190	Conduct diligence calls with potential experts	1.60
02/09/20	K. Kolb	B190	Draft document and agreement regarding case strategy	1.60
02/09/20	K. Kolb	B190	Email to team regarding expert status and analysis	.20
02/10/20	C. Carty	B190	Meet with S. O'Donnell, K. Kolb, and G. Fromer regarding Sears Rule 2004 investigation update and expert review and review materials in connection with meeting.	1.20
02/10/20	G. Fromer	B190	Research backgrounds of potential experts	2.40
02/10/20	G. Fromer	B190	Discuss expert engagement letter and fee arrangement and updates to claims memorandum	.50
02/10/20	G. Fromer	B190	Discuss updates on expert background research and next steps	.20
02/10/20	G. Fromer	B190	Draft questions to interview potential experts	1.50



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02/10/20	G. Fromer	B190	Prepare documents for meeting with partners about updates to claims memorandum and expert background research	.80
02/10/20	G. Fromer	B190	Draft subpoenas for Barclays, Omega, OZ, and Cyrus	.60
02/10/20	G. Fromer	B190	Conduct fact investigation of OZ call logs	.10
02/10/20	K. Kolb	B190	Meeting to discuss potential experts	.30
02/10/20	K. Kolb	B190	Meet with G Fromer regarding diligence research	.10
02/10/20	K. Kolb	B190	Review and revise expert diligence memo	.30
02/10/20	L. Schepp	B110	Reviewing/Editing/Drafting Documents relating to timeline, per K. Kolb	5.00
02/10/20	L. Schepp	B110	Compile documents related to potential experts for attorney review, per S. O'Donnell	.50
02/10/20	L. Schepp	B110	Weslaw searches to identify phone numbers on call logs	1.10
02/10/20	S. O'Donnell	B190	Coordinate interviews	.30
02/10/20	S. O'Donnell	B190	Confer w/ team re expert retention/interviews	.30
02/10/20	S. O'Donnell	B190	Review credentials	.30
02/10/20	S. O'Donnell	B190	Strategy and analysis	.10
02/11/20	C. Carty	B190	Review and analyze internal memo regarding Rule 2004 investigation related to MTN note sale; review and analyze case law discussed.	2.40



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02/11/20	G. Fromer	B190	Conducted diligence research on potential experts' prior work	1.70
02/11/20	G. Fromer	B190	Research cornering the market	.60
02/11/20	G. Fromer	B190	Interview potential experts	.60
02/11/20	K. Kolb	B190	Analyze research and due diligence into potential experts	.10
02/11/20	K. Kolb	B190	Revise memo analyzing facts and claims	.70
02/11/20	K. Kolb	B190	Revise questions for interview of potential experts	.70
02/11/20	K. Kolb	B190	Call with potential expert	.60
02/11/20	L. Schepp	B110	Westlaw search to identify phone numbers in call logs, per K. Kolb	6.80
02/11/20	S. O'Donnell	B190	Expert interviews and prep for same	.50
02/11/20	S. O'Donnell	B190	Coordinate retention of expert	.50
02/12/20	L. Schepp	B110	Reviewing/Editing/Drafting Documents related to Board of Directors index, per K. Kolb	1.20
02/13/20	L. Poretsky	B160	Conference with Steve Smith and Chris Carty re next fee statement; request combined invoices from November 2019 through January 2020; begin draft fifth combined fee application;	3.00
02/13/20	L. Schepp	B110	Reviewing/Editing/Drafting Documents related to Board of Directors index, per K. Kolb	2.60



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02/13/20	S. Smith	B160	(i) Review docket for fee statements, (ii) review prior fee statements, (iii) o/c with L. Poretsky re preparation of fifth fee statement and (iv) discussion with C. Carty re fee statement.	.50
02/14/20	L. Poretsky	B160	Follow up on a status of the combined invoices for the fifth fee statement; continue to draft fifth fee statement	.80
02/18/20	L. Poretsky	B160	Follow up on a status of the combined invoices and continue to draft fee statement	.70
02/18/20	L. Schepp	B110	Compile additional information regarding Wachtel and Deloitte documents, per J. D'Angelo.	1.50
02/19/20	C. Carty	B190	Call with S. Brauner of Akin regarding update in Rule 2004 investigation; confer with K. Kolb re same; review memo.	.80
02/19/20	G. Fromer	B190	Draft subpoenas	.20
02/19/20	G. Fromer	B190	Conduct due diligence on potential experts	1.60
02/19/20	K. Kolb	B190	Status call with C Carty	.20
02/19/20	K. Kolb	B190	Draft status memo to UCC	1.40
02/19/20	K. Kolb	B190	Analyze expert due diligence research and revise email summary re same	1.00
02/19/20	K. Kolb	B190	Revise subpoenas	.20
02/19/20	L. Schepp	B110	Update document chronology and call logs indexes.	1.10



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02/20/20	K. Kolb	B190	Draft and revise memo to UCC regarding investigation	2.30
02/20/20	S. O'Donnell	B190	Confer re expert qualifications/challenges	.20
02/21/20	C. Carty	B190	Review and revise draft memo to clients re Rule 2004 investigation update on MTN sale investigation.	1.90
02/21/20	K. Kolb	B190	Analyze related docket for expert diligence	.30
02/21/20	K. Kolb	B190	Revise memo to UCC	.40
02/21/20	K. Kolb	B190	Analyze produced audio	1.30
02/21/20	L. Poretsky	B160	Follow up re status of the outstanding proformas in connection with fifth fee statement	.20
02/24/20	L. Schepp	B110	Compile and track upcoming case deadlines.	.20
02/25/20	K. Kolb	B190	Email re potential expert qualifications	.30
02/25/20	K. Kolb	B190	Call with potential expert	.20
02/25/20	K. Kolb	B190	Revise memo to UCC	.50
02/26/20	L. Poretsky	B160	Discuss January 2020 proformas with James Call and Steve Smith	.70
02/27/20	L. Poretsky	B160	Continue to draft fifth combine fee statement	1.50
02/27/20	L. Poretsky	B160	Follow up on a status of the proformas re sears matters;	.30
Total				\$138,438.00



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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	19.90	785.00	15,621.50
S. Smith	2.50	765.00	1,912.50
S. Smith	15.10	725.00	10,947.50
K. Kolb	85.20	610.00	51,972.00
G. Fromer	62.50	420.00	26,250.00
L. Poretsky	7.50	390.00	2,925.00
L. Poretsky	12.60	360.00	4,536.00
L. Schepp	54.10	335.00	18,123.50
S. O'Donnell	6.00	1025.00	6,150.00

DISBURSEMENTS

Online Research	907.80
Pacer Charges	18.20
Document Processing	96.00
Duplicating Supplies	6.24
Velobind/binding	22.00
Duplication	720.42
E-Discovery Data Hosting	400.00

Total disbursements	\$2,170.66
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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Case Administration - B110</u>		
	54.40	\$18,353.00
Subtotals	54.40	\$18,353.00
 <u>Fee/Employment Applications - B160</u>		
	27.50	\$12,854.00
Subtotals	27.50	\$12,854.00
 <u>Contested Matters (exclu. assumption/rejection) - B190</u>		
	183.50	\$107,231.00
Subtotals	183.50	\$107,231.00



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

April 20, 2020
Bill Number: 354102
File Number: 19609-0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through March 31, 2020	\$23,582.50
Expenses posted through March 31, 2020	109.54
TOTAL	\$23,692.04

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

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SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



Re: **Sears Bankruptcy**

Bill Number: 354102
File Number: 19609-0001
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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
03/02/20	L. Poretsky	B160	Conference with Kyle Kolb re monthly fee statements.	.30
03/02/20	L. Poretsky	B160	Follow up on status of the January 2020 proformas and bills.	.30
03/02/20	L. Poretsky	B160	Continue to draft combined fifth fee statement.	1.00
03/04/20	G. Fromer	B190	Discuss memorandum to UCC.	.20
03/04/20	G. Fromer	B190	Proofread and revise memorandum of potential claims.	.40
03/04/20	K. Kolb	B190	Revise memo.	.40
03/04/20	S. O'Donnell	B190	Team meeting; strategy and analysis; review/revise memo.	.50
03/06/20	L. Poretsky	B160	Follow up on status of the billing proformas and exchange e-mails regarding filing and payment deadlines.	.40
03/09/20	A. DeLeon	B190	Telephone conference with vendor and review team regarding processing and review work flow.	1.00
03/09/20	D. Kopf	B190	Procedural Advice - Federal re: service of subpoenas.	.10
03/09/20	L. Poretsky	B160	Search prime clerk's docket for filed notice of effective date in connection with final fee application per Steve Smith request.	.30



Re: **Sears Bankruptcy**

Bill Number: 354102
File Number: 19609-0001
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03/09/20	S. O'Donnell	B190	Review/comments on UCC memo.	1.20
03/09/20	S. Smith	B160	Coordinate fee accrual update with Miii.	.30
03/11/20	L. Poretsky	B160	Follow up on status of the combined November 2019-February 2020 and discuss details with billing department.	.50
03/12/20	K. Kolb	B190	Revise memo based on feedback from SO.	.20
03/12/20	S. O'Donnell	B190	Update memo.	1.50
03/13/20	K. Kolb	B190	Revise memo to UCC.	.60
03/13/20	L. Poretsky	B160	Review invoices for Sears Matters 1 and 2 for time from 11/1/19-2/29/2020 and conference with Vanessa Martinez re same.	.60
03/16/20	L. Schepp	B190	Compile documents cited in memo re:2004 motion	1.80
03/17/20	C. Carty	B190	Review, analyze, comment on investigation update memo.	1.10
03/17/20	G. Fromer	B190	Revise memorandum about investigation update.	1.00
03/17/20	K. Kolb	B190	Revise memo and related materials.	.40
03/17/20	L. Poretsky	B190	Review draft of the fifth monthly fee statement and conference with Vanessa Martinez to discuss further revisions.	.60
03/18/20	L. Schepp	B190	Compile documents in memorandum.	.60
03/19/20	K. Kolb	B190	Revise memorandum and send to co-counsel.	.90



Re: **Sears Bankruptcy**

Bill Number: 354102
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03/19/20	L. Schepp	B190	Compile exhibits cited in Memorandum.	2.80
03/19/20	S. O'Donnell	B190	Revise memo to UCC.	1.00
03/20/20	A. DeLeon	B190	Review and analyze document review database.	.40
03/23/20	L. Poretsky	B160	Review and analyze combined fifth fee statement and conference with team to provide/confirm information.	.80
03/23/20	L. Poretsky	B160	Discussion with team and billing department re bankruptcy task codes for Sears 2 matter (adversary proceeding) and how to add them to the prior billing entries.	.50
03/23/20	S. Smith	B160	Coordinate preparation and filing of consolidated monthly fee statement and multiple discussions with paralegal re same.	.30
03/24/20	L. Poretsky	B160	Circulate draft of fifth fee statement for approval (.2); Revise fifth fee statement per Steve Smith comments (.4); assemble exhibits (.4).	1.00
03/24/20	L. Poretsky	B160	Prepare for filing and e-file.	.50
03/24/20	L. Poretsky	B160	Draft and submit e-mail to Prime Clerk regarding service and Chambers copies of the fifth fee statement (.4); discuss details of service (.2).	.60



Re: **Sears Bankruptcy**

Bill Number: 354102
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03/24/20	S. Smith	B160	Continued coordination and discussion with paralegal re prep and filing of consolidated monthly fee statement.	.80
03/25/20	C. Carty	B190	Review and analyze comments on memo to UCC regarding investigation update.	.50
03/25/20	K. Kolb	B190	Analyze protective order.	.10
03/25/20	K. Kolb	B190	Revise memo to UCC	1.60
03/26/20	K. Kolb	B190	Revise chronology.	.90
03/26/20	L. Schepp	B190	Update documents cited in memorandum and index of documents.	2.20
03/26/20	S. O'Donnell	B190	Coordinate UCC presentation.	.20
03/26/20	S. Smith	B160	(i) Review email from Mary at M-III re fee accruals, (ii) discussion with C. D'Angelo re prep, and (iii) review same.	.30
03/27/20	K. Kolb	B190	Prepare materials for UCC call.	.40
03/27/20	S. O'Donnell	B190	Review/comment on meet and confer summaries.	.20
03/30/20	L. Schepp	B190	Compile Stroock and Quinn privilege documents for chronology timeline.	1.50
03/30/20	N. Hassall	B190	Discussion with paralegal re documents , review of privileged documents, format and date/time label electronic documents for partner review and use.	2.20
03/30/20	S. O'Donnell	B190	Coordinate ucc call.	.20



Re: **Sears Bankruptcy**

Bill Number: 354102
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03/31/20	C. Carty	B190	Review investigation memo related Rule 2004 investigation of MTN sale.	.80
03/31/20	C. Carty	B190	Participate in prep call for UCC meeting regarding investigation update.	.50
03/31/20	G. Fromer	B190	Discuss presentation to UCC on investigation update and expert retention request.	.40
03/31/20	G. Fromer	B190	Prepare for presentation to UCC on investigation update and expert retention request.	3.20
03/31/20	K. Kolb	B190	Revise agenda for call with UCC.	.20
03/31/20	K. Kolb	B190	Revise outline of talking points for UCC call.	.30
03/31/20	K. Kolb	B190	Attend team call to discuss presentation to UCC.	.50
03/31/20	N. Hassall	B190	Review of privileged documents, format and date/time label electronic documents for partner review and use, e-mails to/ from paralegal re documents.	4.20
Total				\$23,582.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	2.90	785.00	2,276.50
S. Smith	1.70	765.00	1,300.50



Re: **Sears Bankruptcy**

Bill Number: 354102
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<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
K. Kolb	6.50	610.00	3,965.00
G. Fromer	5.20	420.00	2,184.00
D. Kopf	.10	410.00	41.00
L. Poretsky	7.40	390.00	2,886.00
N. Hassall	6.40	390.00	2,496.00
A. DeLeon	1.40	380.00	532.00
L. Schepp	8.90	335.00	2,981.50
S. O'Donnell	4.80	1025.00	4,920.00

DISBURSEMENTS

Duplication	9.54
E-Discovery Data Hosting	100.00

Total disbursements	\$109.54
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Re: **Sears Bankruptcy**

Bill Number: 354102
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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Fee/Employment Applications - B160</u>		
	8.50	\$3,952.50
Subtotals	8.50	\$3,952.50
 <u>Contested Matters (exclu. assumption/rejection) - B190</u>		
	36.80	\$19,630.00
Subtotals	36.80	\$19,630.00



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

May 29, 2020
Bill Number: 355261
File Number: 19609-0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through April 30, 2020	\$52,570.50
Expenses posted through April 30, 2020	61,176.22
TOTAL	\$113,746.72

**Kindly return this page with your check
payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
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Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



Re: **Sears Bankruptcy**

Bill Number: 355261
File Number: 19609-0001
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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
04/01/20	C. Carty	B190	Review and analyze documents in preparation for presentation to UCC regarding status of investigation.	1.50
04/01/20	C. Carty	B190	Review and analyze outline for UCC presentation regarding investigation.	1.20
04/01/20	D. Field	B160	Analyze and review documents produced in adversary proceeding.	4.60
04/01/20	G. Fromer	B190	Prepare for call with UCC.	2.00
04/01/20	K. Kolb	B190	Revise talking points	1.50
04/01/20	K. Kolb	B190	Prepare for call with UCC and analyze memo and related documents	.80
04/02/20	C. Carty	B190	Participate in call with UCC members regarding Rule 2004 investigation update and other case updates and prepare for same.	1.00
04/02/20	C. Carty	B190	Calls with S. O'Donnell, K. Kolb, and G. Fromer regarding presentation to UCC in connection with Rule 2004 investigation.	1.00
04/02/20	G. Fromer	B190	Review background materials and prepare presentation to UCC on Rule 2004 investigation findings	2.40



Re: **Sears Bankruptcy**

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04/02/20	G. Fromer	B190	Discuss preparation for presentation to UCC on Rule 2004 investigation findings.	.30
04/02/20	G. Fromer	B190	Discuss preparation for presentation to UCC on Rule 2004 investigation findings.	.80
04/02/20	G. Fromer	B190	Call with Akin and UCC to present Rule 2004 investigation findings.	.90
04/02/20	K. Kolb	B190	Revise bullet points and discuss with SO, CC, and GF	1.40
04/02/20	K. Kolb	B190	Prepare for and present at UCC call regarding investigation	1.40
04/02/20	S. O'Donnell	B190	Prep and participate in UCC presentation.	2.50
04/03/20	K. Kolb	B190	Revise expert engagement letter	1.40
04/06/20	C. Carty	B190	Attention to expert issues.	.80
04/06/20	K. Kolb	B190	Revise engagement letter	.50
04/08/20	D. Kopf	B190	Procedural Advice - Federal re: impact of COVID-19 on service of process.	.10
04/08/20	K. Kolb	B190	Revise engagement letter and send to potential expert	.30
04/13/20	K. Kolb	B190	Call with potential expert	.10
04/13/20	K. Kolb	B190	Revise engagement letter	.60
04/14/20	C. Carty	B190	Call with experts related to Rule 2004 investigation engagement and prep for same.	.50
04/14/20	K. Kolb	B190	Draft email summary to expert	1.20
04/14/20	K. Kolb	B190	Call with expert	.70



Re: **Sears Bankruptcy**

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04/14/20	S. Smith	B160	Attention to interim fee app schedule and discussion with Sears Professional Fee Committee re same.	.50
04/15/20	K. Kolb	B190	Research and summary email regarding expert retention	1.00
04/16/20	K. Kolb	B190	Email to expert regarding engagement	.20
04/16/20	S. O'Donnell	B190	Attend to expert retention.	.20
04/17/20	C. Carty	B190	Call with S. O'Donnell, K. Kolb, and G. Fromer re strategy for Rule 2004 investigation.	.50
04/17/20	G. Fromer	B190	Analyze which discoverable documents to provide to retained expert	.50
04/17/20	G. Fromer	B190	Discuss materials to send to retained expert and deposition preparation	.20
04/17/20	K. Kolb	B190	Call to discuss case strategy	.20
04/17/20	K. Kolb	B190	Email regarding next steps of investigation	.10
04/17/20	K. Kolb	B190	Prepare and send materials for expert	.80
04/17/20	L. Schepp	B190	Compile documents for experts CMRA review	3.70
04/17/20	S. O'Donnell	B190	Team call; prep for same.	.50
04/20/20	L. Poretsky	B160	Begin drafting first interim fee application.	2.50
04/20/20	L. Poretsky	B160	Obtain Akin's form of the interim fee application and review.	.60



Re: **Sears Bankruptcy**

Bill Number: 355261
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04/21/20	L. Schepp	B190	Compile documents related to MTNs for expert review.	.40
04/21/20	S. Smith	B160	Attention to issues re prep of monthly/interim fee statements and discussions re same.	.90
04/22/20	K. Kolb	B160	Draft summary of fees incurred for fee application	.90
04/22/20	L. Poretsky	B160	Conference with billing department to discuss details.	.20
04/22/20	L. Poretsky	B160	Conference call with Akin re filing of interim fee application.	.30
04/22/20	L. Poretsky	B160	Conference call with Steve Smith to discuss interim fee application and sixth fee statement.	.40
04/22/20	L. Poretsky	B160	Request information from billing department related to the received payments.	.30
04/22/20	L. Poretsky	B160	Review summary of payments.	.30
04/22/20	S. O'Donnell	B190	Prep and participate in call w/ experts; f/up re same.	1.50
04/22/20	S. Smith	B160	Attention to email traffic re fee app.	.30
04/22/20	S. Smith	B160	Multiple discussion with team re fee app prep and codes.	.70
04/23/20	C. Carty	B190	Call with experts re investigation and case theories.	1.20
04/23/20	G. Fromer	B190	Discuss analysis of claims with experts	1.30
04/23/20	K. Kolb	B190	Introductory strategy call with experts	1.30



Re: **Sears Bankruptcy**

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04/23/20	L. Poretsky	B160	Conference with billing department to discuss information needed for the interim fee application (.5); review, calculate and update draft of the first interim fee application (2.0)	2.50
04/23/20	L. Schepp	B190	Compile documents related to MTNs for expert review.	1.10
04/23/20	S. Smith	B160	Prep of interim fee statement.	1.50
04/24/20	L. Poretsky	B160	Follow up on a request for billing information, review and submit request for further information (.5); revise first interim fee application, calculate hours fees, per codes and per timekeepers, average rate and so on and update the draft (2.5); conference with Steve Smith re fee application issues (.5)	3.50
04/24/20	S. Smith	B160	Attention to prep and issues related to interim fee state and monthly fee statements.	1.50
04/25/20	L. Poretsky	B160	Review and analyze combined bill and expense summary and further calculate hours, fees, expenses (1.8); continue to draft and revise first interim fee application (3); exchange e-mails with the team to confirm accurate description of work perform per bankruptcy codes (.3); submit to Steve Smith for review with comments (.4)	5.50
04/26/20	S. Smith	B160	Fee App prep.	1.50



Re: **Sears Bankruptcy**

Bill Number: 355261
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04/27/20	L. Poretsky	B160	Conference with billing department to discuss and obtain additions information for the first fee application (4); continue to draft application and exhibits (1.5)	1.90
04/27/20	L. Schepp	B190	Update list of documents sent to experts	.50
04/27/20	S. Smith	B160	Fee App prep.	1.00
04/27/20	S. Smith	B160	Fee App prep.	.70
04/28/20	L. Schepp	B190	Cite and fact check Opposition to Cyrus' Motion to Dismiss.	2.00
04/28/20	S. Smith	B160	Fee app prep.	1.00
04/29/20	A. Cruz	B190	Reviewed and docketed email from Dorothy Li on 4/29/20 advising of pretrial conference scheduled for 6/4/20.	.10
04/29/20	D. Kopf	B190	Procedural Advice - Federal re: impact of COVID-19 on service of subpoenas.	.30
04/29/20	K. Kolb	B190	Analyze memo from expert and draft response	1.60
04/29/20	L. Poretsky	B160	Team discussion re issue of the application of the task code and fixing it (.5); conference with billing department re updated summaries for the fee application	.60
04/29/20	L. Schepp	B190	Fact and Cite check Opposition to Cyrus Motion to Dismiss Memorandum.	6.40
04/29/20	S. Smith	B160	Continued fee app prep and discussions with others re same.	3.50



Re: **Sears Bankruptcy**

Bill Number: 355261
File Number: 19609-0001
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04/30/20	L. Schepp	B190	Fact and cite check cites in Opposition Memorandum in preparation for filing	6.90
04/30/20	S. Smith	B160	Continued prep of fee app.	2.50
Total				\$52,570.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	7.70	785.00	6,044.50
S. Smith	15.60	765.00	11,934.00
K. Kolb	16.00	610.00	9,760.00
D. Field	4.60	435.00	2,001.00
G. Fromer	8.40	420.00	3,528.00
D. Kopf	.40	410.00	164.00
L. Poretsky	18.60	390.00	7,254.00
L. Schepp	21.00	335.00	7,035.00
A. Cruz	.10	325.00	32.50
S. O'Donnell	4.70	1025.00	4,817.50

DISBURSEMENTS

Shipping	123.52
Expert Witness Fees	60,602.50
Pacer Charges	86.20



Re: **Sears Bankruptcy**

Bill Number: 355261
File Number: 19609-0001
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Document Processing	264.00
E-Discovery Data Hosting	100.00
Total disbursements	\$61,176.22



Re: **Sears Bankruptcy**

Bill Number: 355261
File Number: 19609-0001
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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Fee/Employment Applications - B160</u>		
	39.70	\$21,738.00
Subtotals	39.70	\$21,738.00
 <u>Contested Matters (exclu. assumption/rejection) - B190</u>		
	57.40	\$30,832.50
Subtotals	57.40	\$30,832.50



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

June 30, 2020
Bill Number: 356215
File Number: 19609-0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through May 31, 2020	\$34,501.00
Expenses posted through May 31, 2020	43,499.27
TOTAL	\$78,000.27

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

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Citibank, N.A.
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Account Number: 6165
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PLEASE REMIT PAYMENT WITHIN 30 DAYS



Re: **Sears Bankruptcy**

Bill Number: 356215
File Number: 19609-0001
Page 2

LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
05/01/20	K. Kolb	B190	Call with expert	.40
05/01/20	K. Kolb	B190	Analyze ISDA documents	.30
05/01/20	S. Smith	B160	Continued work on interim fee app and coordinate prep with L. Poretsky, paralegal and C. D'Angelo, billing.	1.50
05/02/20	L. Poretsky	B160	Review and analyze revised bills and re-calculate hours and fees per bankruptcy codes(1.3); revise first interim fee application per updated calculations (.5); submit to Steve Smith for review with comments (.2)	2.00
05/03/20	S. Smith	B160	Continued review of and revisions to first interim fee app.	1.00
05/04/20	K. Kolb	B190	Analyze documents produced by CDS participants regarding CDS positions held	.70
05/04/20	K. Kolb	B190	Email to expert regarding outstanding obligations	.20
05/04/20	K. Kolb	B190	Draft analysis of note purchase agreement	.60
05/04/20	L. Poretsky	B160	Conference with billing department to discuss information needed for the first fee application and review final bills	.60



Re: **Sears Bankruptcy**

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05/04/20	L. Poretsky	B160	Update draft of the first interim fee application and circulate to the team	1.00
05/04/20	S. Smith	B160	Continued review of and revisions to draft interim fee application and discussion with L. Poretsky, paralegal.	1.00
05/05/20	L. Poretsky	B160	Assist Steve Smith in a preparation of the fee application by providing documents and information by request;	.60
05/05/20	S. O'Donnell	B190	Deposition preparation.	1.00
05/05/20	S. Smith	B160	Follow up with C. Carty and paralegal on prep of interim fee application.	.70
05/06/20	L. Poretsky	B160	Assist team with the preparation of the first fee application	1.00
05/06/20	S. Smith	B160	Continued review of and revision to first interim fee app and multiple discussions with L. Poretsky, paralegal, C. D'Angelo, billing, and Chris Carty, partner.	2.00
05/07/20	K. Kolb	B190	Email regarding expert's analysis	.20
05/07/20	K. Kolb	B190	Prepare for call with experts	.20
05/07/20	S. O'Donnell	B190	Prep for expert call.	1.00
05/07/20	S. Smith	B160	Prep of interim fee app.	3.00
05/08/20	C. Carty	B190	Participate in call with experts re investigation analysis and prepare for same.	1.00



Re: **Sears Bankruptcy**

Bill Number: 356215
File Number: 19609-0001
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05/08/20	K. Kolb	B190	Attend call with expert to discuss additional diligence	1.00
05/08/20	K. Kolb	B190	Analyze debtors' schedules of assets	1.80
05/08/20	L. Poretsky	B160	Team conference call regarding revisions to the fee application; communications with team re Steve Smith comments	.60
05/08/20	L. Schepp	B190	Compile documents for expert review.	.80
05/08/20	S. O'Donnell	B190	Prep for expert call (.5); precall re same (.3); participate in diligence and planning call w/ expert; f/up re same (1.2)	2.00
05/08/20	S. Smith	B160	Review and revisions to fee app and discussion re same.	1.50
05/09/20	K. Kolb	B190	Call with expert	.20
05/09/20	K. Kolb	B190	Further analysis of agreement and email to experts re same	1.00
05/09/20	L. Poretsky	B160	Review and analyze revised bills and re-calculate hours and fees per bankruptcy task codes (1.3); revise first interim fee application per updated calculations (.5); circulate to the team for review (.2)	2.00
05/10/20	S. Smith	B160	Further review of fee app exhibits and attention to email re same.	.50
05/11/20	K. Kolb	B190	Further analysis of ISDA documents and related issues	1.90



Re: **Sears Bankruptcy**

Bill Number: 356215
File Number: 19609-0001
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05/11/20	L. Poretsky	B160	Communications with the team including billing department related to the latest changes to the billing;	.50
05/11/20	L. Poretsky	B160	Further revise first interim fee application per updated task codes	.40
05/11/20	L. Poretsky	B160	Work on fee application issues such statistics which compare a blended rates billed by attorney and paralegals in NY office, time spend on reviewing or revising time records or preparing, reviewing, or revising invoices to comply with US Trustee guidance	2.20
05/11/20	S. Smith	B160	Continued Fee App prep.	1.00
05/11/20	S. Smith	B160	T/C with Mary at M-III Partners re fee app and coordinate sharing of weekly accruals.	.20
05/11/20	S. Smith	B160	Further review of revised fee app and attention to email traffic re same.	.80
05/12/20	L. Poretsky	B160	Assist team to finalize first fee application by requesting and analyzing additional information form billing department	.60
05/12/20	S. Smith	B160	Attention to final revisions to interim fee app.	.30
05/12/20	S. Smith	B160	Respond to M-III Partners with accrual and budget information.	.30
05/13/20	K. Kolb	B190	Call with expert	.30
05/14/20	L. Poretsky	B160	Prepare HF first fee application for filing and e-file	.60



Re: **Sears Bankruptcy**

Bill Number: 356215
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05/14/20	L. Poretsky	B160	Review, fix issues related to the formatting of the HF first fee application and circulate for approval to file	.80
05/14/20	L. Poretsky	B160	Communications with Prime Clerk to coordinate service of HF first fee application and discuss details	.60
05/14/20	L. Schepp	B190	Identify names and entities associated with call logs to identify potential custodians for document demands.	3.60
05/14/20	S. Smith	B160	Follow up review of final fee app, review reply from committee chair and filing of same.	.20
05/14/20	S. Smith	B160	Review final draft of final fee app and review email from Carty re same.	.30
05/15/20	L. Schepp	B190	Continued identification of phone numbers on call logs, per K. Kolb	5.80
05/21/20	C. Carty	B160	Coordinate drafting of March and April fee statements.	1.10
05/23/20	K. Kolb	B190	Analyze memo draft by expert	.20
05/26/20	K. Kolb	B190	Analyze list of questions and further analysis from expert	1.00
05/27/20	C. Carty	B160	Call with S. Brauner of Akin re billing issue (0.2); correspondence with Debtors professionals re Herrick fees (0.3).	.50
05/27/20	S. Smith	B160	Coordinate prep of weekly accruals for fee committee and exchange emails with MIII re same.	.20



Re: **Sears Bankruptcy**

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05/28/20	C. Carty	B190	Review and analyze expert document requests and work product.	1.20
05/28/20	C. Carty	B160	Review invoices for fee statement and provide comments.	1.50
05/28/20	K. Kolb	B190	Draft email regarding subpoenas and additional documents	.40
05/28/20	K. Kolb	B160	Revise draft fee application	.20
Total				\$34,501.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	5.30	785.00	4,160.50
S. Smith	14.50	765.00	11,092.50
K. Kolb	10.60	610.00	6,466.00
L. Poretsky	13.50	390.00	5,265.00
L. Schepp	10.20	335.00	3,417.00
S. O'Donnell	4.00	1025.00	4,100.00

DISBURSEMENTS

Online Research	57.27
Expert Witness Fees	43,330.00
Document Processing	12.00
E-Discovery Data Hosting	100.00



Re: **Sears Bankruptcy**

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Total disbursements \$43,499.27



Re: **Sears Bankruptcy**

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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Fee/Employment Applications - B160</u>		
	31.30	\$18,913.00
Subtotals	31.30	\$18,913.00
 <u>Contested Matters (exclu. assumption/rejection) - B190</u>		
	26.80	\$15,588.00
Subtotals	26.80	\$15,588.00



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

July 16, 2020
Bill Number: 356647
File Number: 19609-0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through June 30, 2020	\$52,027.50
Expenses posted through June 30, 2020	10,789.68
TOTAL	\$62,817.18

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



Re: **Sears Bankruptcy**

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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
06/01/20	C. Carty	B190	Review and analyze analysis from experts.	.50
06/01/20	G. Fromer	B190	Revise subpoenas and research language on notice of taking remote virtual depositions	.90
06/01/20	K. Kolb	B190	Draft email to opposing counsel regarding additional testimony	.20
06/01/20	S. O'Donnell	B190	Coordinate depos and subpoena.	.50
06/02/20	C. Carty	B160	Review and revise monthly fee statement.	1.50
06/02/20	C. Carty	B190	Call with K. Kolb and G. Fromer regarding depositions and prepare for same.	.60
06/02/20	C. Carty	B190	Review and comment on draft correspondence regarding depositions.	1.20
06/02/20	G. Fromer	B190	Discuss subpoenas and deposition prep	.20
06/02/20	G. Fromer	B190	Prepare for depositions by drafting witness questions and reviewing fact memorandum and discovery	3.90
06/02/20	K. Kolb	B190	Attend call with C. Carty and G. Fromer regarding investigation next steps	.30
06/02/20	K. Kolb	B190	Discuss deposition preparation with G. Fromer	.10



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06/02/20	K. Kolb	B190	Draft email summarizing status of investigation	.80
06/02/20	L. Poretsky	B160	Search Prime Clerk website for hearing date on Interim fee application, calendar and circulate to the team with the Telephonic Appearances instructions.	.40
06/02/20	L. Poretsky	B160	Revise and finalize exhibits to the fee statement (.4); Assemble sixth fee statement and exhibits (.4); e-file on a docket (.5); prepare and submit e-mail to Prime Clerk requesting service of the sixth fee statement (.3); circulate objection date to the team (.2)	1.80
06/03/20	G. Fromer	B190	Prepare for depositions by drafting witness questions and reviewing background materials	6.90
06/03/20	K. Kolb	B190	Analyze timeline of auction related events	.20
06/03/20	L. Schepp	B190	Update chronology for attorney review.	.30
06/05/20	L. Schepp	B190	Compile isda filings for chronology.	2.30
06/08/20	K. Kolb	B190	Analyze case timeline	.30
06/08/20	L. Schepp	B190	Compile and index remaining isda documents for chronology.	5.30
06/09/20	C. Carty	B160	Respond to M-III requests for information related to billing.	.40
06/09/20	G. Fromer	B190	Discuss revising deposition outlines	.10



Re: **Sears Bankruptcy**

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06/09/20	K. Kolb	B190	Revise deposition outline	.50
06/09/20	K. Kolb	B190	Revise timeline of auction events	.20
06/09/20	L. Schepp	B190	Update document chronology for attorney review,	4.80
06/10/20	C. Carty	B160	Provide Debtors' professionals with information related to fees.	.30
06/10/20	K. Kolb	B190	Analyze revisions to communication with opposing counsel	.20
06/10/20	L. Schepp	B190	Continue to update document chronology prior to attorney review.	1.80
06/10/20	S. O'Donnell	B190	Review/comment on depo notices, discovery requests and correspondence re same; confer w/ team re same.	.50
06/11/20	G. Fromer	B190	Review documents produced in discovery and draft outlines for depositions	6.20
06/11/20	G. Fromer	B190	Discuss revising and serving subpoenas for depositions	.10
06/11/20	G. Fromer	B190	Revise subpoenas for depositions	.80
06/11/20	K. Kolb	B190	Finalize subpoenas and transmit to opposing counsel	1.30
06/11/20	L. Schepp	B190	Continued update of document chronology for attorney review	2.70
06/11/20	S. O'Donnell	B190	Discovery and case admin.	.50
06/11/20	S. Smith	B190	Attention to depo notices for CDS participants and related analysis.	.80



Re: **Sears Bankruptcy**

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06/12/20	A. DeLeon	B110	Review and analyze document review database.	.50
06/12/20	G. Fromer	B190	Review documents produced in discovery and draft outlines for depositions	3.60
06/12/20	K. Kolb	B190	Email to expert regarding status	.10
06/15/20	C. Carty	B160	Confer with Akin re hearing on interim fee applications (0.3); review draft order re interim fee application from Weil and provide comments thereto (0.3).	.60
06/15/20	S. O'Donnell	B190	Coordinate meet and confer.	.30
06/15/20	S. Smith	B160	Attention to and review of emails/orders re upcoming final fee hearing.	.30
06/15/20	S. Smith	B190	Analysis and attention to meet & confer request for depositions.	.40
06/16/20	C. Carty	B160	Prepare for hearing on interim fee applications.	.60
06/16/20	C. Carty	B190	Participate in meet and confer call with Stroock regarding subpoena in connection with Rule 2004 investigation and prepare for same.	.60
06/16/20	G. Fromer	B190	Meet and Confer with Stroock	.20
06/16/20	K. Kolb	B190	Follow up regarding subpoena service	.10
06/16/20	S. O'Donnell	B190	Meeting and confer w/ Stroock.	.50
06/17/20	C. Carty	B160	Prepare for hearing on interim fee application.	.70



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06/17/20	C. Carty	B160	Attention to matters related to billing.	.60
06/17/20	C. Carty	B160	Participate in hearing on fee application.	1.00
06/17/20	K. Kolb	B190	Revise deposition outline	2.90
06/17/20	S. Smith	B190	Attention to met & confer issues.	.20
06/18/20	K. Kolb	B190	Emails to opposing counsel regarding requests in investigation	.20
06/18/20	L. Schepp	B190	Compile and index documents cited in deposition outlines for attorney review.	2.70
06/18/20	L. Schepp	B190	Update chronology in preparation for attorney review.	.70
06/19/20	C. Carty	B190	Call with experts regarding analysis of ISDA auction impact on MTN sale (1.4); pre-call with Herrick team (0.4); review and analyze experts work product (2.1).	3.90
06/19/20	G. Fromer	B190	Discuss objectives of call with experts	.30
06/19/20	G. Fromer	B190	Call with experts to prepare for depositions	1.40
06/19/20	K. Kolb	B190	Attend call with experts regarding case analysis	1.40
06/19/20	K. Kolb	B190	Further analysis of expert memo regarding case theories and background facts	1.70
06/19/20	S. O'Donnell	B190	Prep and participate in expert call; pre-call for same.	1.30



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06/22/20	K. Kolb	B190	Draft letter to UCC regarding strategy update	.90
06/22/20	S. O'Donnell	B190	Coordinate discovery and meet and confers.	.50
06/23/20	K. Kolb	B190	Revise agreement regarding investigation	.60
06/23/20	K. Kolb	B190	Analyze issues relating to plan and claims allowed	1.70
06/23/20	L. Schepp	B190	Update chronology.	.80
06/23/20	S. Smith	B190	Exchange emails with K. Kolb re discovery from Barclays and review file re same.	.50
06/23/20	S. Smith	B190	Attention to email traffic re meet & confers.	.20
06/24/20	C. Carty	B190	Meet and confer with Quinn Emanuel re deposition subpoena(0.5); prepare for same (0.5).	1.00
06/24/20	G. Fromer	B190	Prepare for meet and confer call regarding Rule 2004 Investigation	.20
06/24/20	G. Fromer	B190	Meet and confer call regarding Rule 2004 Investigation	.40
06/24/20	L. Schepp	B190	Update chronology.	.80
06/25/20	K. Kolb	B190	Draft email regarding expert call and analysis	.40
06/25/20	K. Kolb	B190	Analyze questions from expert team	.10
06/25/20	L. Schepp	B190	Update chronology.	2.60



Re: **Sears Bankruptcy**

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06/29/20	C. Carty	B190	Attention to issues related to depositions.	.50
06/29/20	G. Fromer	B190	Review research substantiating decision to hire expert	.40
06/29/20	G. Fromer	B190	Discuss preparing for follow up meet and confer call with deponent's counsel	.20
06/29/20	G. Fromer	B190	Prepare for follow up meet and confer call with deponent's counsel	.20
06/29/20	K. Kolb	B190	Call to counsel for opposing counsel regarding investigation	.20
06/29/20	K. Kolb	B190	Draft summary of investigation status	.50
06/29/20	K. Kolb	B190	Call with experts regarding diligence questions	.30
06/29/20	K. Kolb	B190	Revise chronology for deposition preparation	.30
06/29/20	L. Schepp	B190	Compile and annotate documents cited in deposition outlines in preparation for attorney review.	3.60
06/30/20	G. Fromer	B190	Review email update on status of case and future case strategy	.10
06/30/20	G. Fromer	B190	Call with expert and financial advisor	.80
06/30/20	G. Fromer	B190	Revise deposition outlines	.30
06/30/20	G. Fromer	B190	Review draft of case status update to UCC	.10
06/30/20	G. Fromer	B190	Review draft of agreement	.20



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06/30/20	K. Kolb	B190	Draft status update and related call follow-ups regarding investigation	.50
06/30/20	K. Kolb	B190	Analyze documents from experts in advance of call	1.60
06/30/20	K. Kolb	B190	Call with experts regarding background facts of debt holdings	1.00
06/30/20	L. Schepp	B190	Annotate selected documents for attorney review for deposition preparation.	4.60
Total				\$52,027.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	14.00	785.00	10,990.00
S. Smith	2.40	765.00	1,836.00
K. Kolb	18.60	610.00	11,346.00
G. Fromer	27.50	420.00	11,550.00
L. Poretsky	2.20	390.00	858.00
A. DeLeon	.50	380.00	190.00
L. Schepp	33.00	335.00	11,055.00
S. O'Donnell	4.10	1025.00	4,202.50

DISBURSEMENTS

Expert Witness Fees	10,312.50
Document Processing	237.50



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Duplicating Supplies	31.68
Duplication	108.00
E-Discovery Data Hosting	100.00
Total disbursements	<hr/> \$10,789.68



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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Case Administration - B110</u>		
	.50	\$190.00
Subtotals	.50	\$190.00
 <u>Fee/Employment Applications - B160</u>		
	8.20	\$5,562.00
Subtotals	8.20	\$5,562.00
 <u>Contested Matters (exclu. assumption/rejection) - B190</u>		
	93.60	\$46,275.50
Subtotals	93.60	\$46,275.50



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

August 24, 2020
Bill Number: 358157
File Number: 19609-0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through July 31, 2020	\$34,455.00
Expenses posted through July 31, 2020	9,370.32
TOTAL	\$43,825.32

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



Re: **Sears Bankruptcy**

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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
07/01/20	C. Carty	B190	Call with Herrick team regarding deposition planning related to Rule 2004 investigation (0.5); prepare for same (0.3).	.80
07/01/20	G. Fromer	B190	Discuss future case strategy	.40
07/01/20	K. Kolb	B160	Analyze draft of monthly fee statement	.20
07/01/20	K. Kolb	B190	Analyze email from opposing counsel	.10
07/01/20	K. Kolb	B190	Revise chronology and analyze documents in connection with deposition preparation	2.40
07/01/20	K. Kolb	B190	Attend call regarding strategy for meet and confers	.50
07/01/20	L. Schepp	B190	Identify additional documents for deposition kits	1.20
07/01/20	S. O'Donnell	B190	Team call; prep for same; coordinate depositions and add'l discovery; review expert analysis.	1.00
07/02/20	C. Carty	B190	Meet and confer with counsel to OCO Capital in connection with Rule 2004 investigation and prepare for same.	1.10
07/02/20	G. Fromer	B190	Discuss issues regarding meet and confer with deponent's counsel	.10
07/02/20	G. Fromer	B190	Call with potential deponent's opposing counsel	.30



Re: **Sears Bankruptcy**

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07/02/20	G. Fromer	B190	Review fact section of memo on potential claims and deposition outline to draft topic areas for questioning	2.00
07/02/20	K. Kolb	B190	Revise chronology in connection with deposition preparation	.30
07/02/20	K. Kolb	B190	Call with opposing counsel regarding subpoena	.40
07/02/20	K. Kolb	B190	Analyze issue related to witness service of subpoena	.40
07/02/20	S. O'Donnell	B190	Coordinate meet and conver w/ OCO.	.30
07/05/20	S. O'Donnell	B190	Case admin.	.50
07/06/20	C. Carty	B160	Review and finalize monthly fee statement.	.20
07/06/20	G. Fromer	B190	Revise topic ideas for questioning	.20
07/06/20	K. Kolb	B190	Further analysis of documents in connection with revising deposition outlines	.50
07/06/20	K. Kolb	B190	Revise chronology and deposition materials	.40
07/06/20	K. Kolb	B190	Revise list of interview questions	.30
07/06/20	L. Poretsky	B160	Review seventh fee statement and exhibits and redact private information (.5); assemble seventh fee statement (.4); prepare same for filing and e-file (.3); submit e-mail to Prime clerk re service of the seventh fee statement (.3)	1.50
07/06/20	S. O'Donnell	B190	Confer re: Sculptor discovery.	.30



Re: **Sears Bankruptcy**

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07/07/20	C. Carty	B190	Meet and confer call with counsel to Cyrus regarding Rule 2004 investigation and prepare for same.	.60
07/07/20	G. Fromer	B190	Reflect on call and action list to prepare for Monday's call with Milbank	.20
07/07/20	G. Fromer	B190	Discuss revising deposition outlines	.10
07/07/20	G. Fromer	B190	Revise deposition outlines and add additional documentary exhibits	3.40
07/07/20	G. Fromer	B190	Call with Milbank regarding Rule 2004 investigation	.40
07/07/20	K. Kolb	B190	Calls with opposing counsel regarding subpoena and related requests	.80
07/07/20	K. Kolb	B190	Revise deposition outline	1.40
07/07/20	S. O'Donnell	B190	Prep/participate in cyrus call.	.50
07/08/20	G. Fromer	B190	Revise deposition outlines and add additional documentary exhibits	2.20
07/08/20	G. Fromer	B190	Draft email to experts regarding information requests from deponents	.20
07/08/20	K. Kolb	B190	Revise deposition outline	.30
07/08/20	S. O'Donnell	B190	Confer re Sculptor production; review same.	.50
07/09/20	C. Carty	B190	Review and comment on draft outline.	.50
07/09/20	G. Fromer	B190	Prepare for call with deponent's counsel	.10



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07/09/20	G. Fromer	B190	Summarize discussion with expert about information requests	.10
07/09/20	G. Fromer	B190	Discuss information requests with expert	.10
07/09/20	K. Kolb	B190	Call to counsel for Barclays regarding deposition	.30
07/09/20	K. Kolb	B190	Call with expert regarding deposition prep	.20
07/13/20	C. Carty	B190	Call with K. Kolb and G. Fromer re status and next steps.	.20
07/13/20	G. Fromer	B190	Discuss preparing for call with deponent's counsel	.20
07/13/20	K. Kolb	B190	Team call regarding status	.20
07/13/20	L. Schepp	B190	Update chronology for attorney review.	2.90
07/14/20	C. Carty	B190	Call with consultants re investigation information requests (0.8); prepare for same (0.5).	1.30
07/14/20	G. Fromer	B190	Update Kyle Kolb on end of phone discussion with expert	.10
07/14/20	G. Fromer	B190	Discuss scope of information requests with expert	.70
07/14/20	G. Fromer	B190	Update topic areas to discuss with deponent's counsel to incorporate discussion with expert	.20
07/14/20	K. Kolb	B190	Prepare for and attend call with experts	.70
07/14/20	L. Schepp	B190	Update chronology.	1.40



Re: **Sears Bankruptcy**

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07/15/20	C. Carty	B190	Analyze issues related to Rule 2004 investigation and information requests.	.40
07/15/20	C. Carty	B160	Attention to fee statement.	.20
07/15/20	C. Carty	B190	Meet and confer with Milbank re information requests in connection with investigation.	.50
07/15/20	G. Fromer	B190	Revise topic areas to discuss with deponent's counsel to incorporate discussion with expert	.20
07/15/20	G. Fromer	B190	Call with deponent's counsel to discuss information requests and scheduling deposition	.50
07/15/20	G. Fromer	B190	Prepare for call with deponent's counsel	.20
07/15/20	K. Kolb	B190	Prepare for and attend meet and confer with opposing counsel and follow-up call with G. Fromer	.80
07/15/20	K. Kolb	B190	Draft emails to opposing counsel and revise list of topic areas for investigation	.50
07/16/20	G. Fromer	B190	Speak with expert about questions to ask deponent	.20
07/16/20	G. Fromer	B190	Summarize and reflect on discussion with expert about questions to ask deponent	.10
07/16/20	G. Fromer	B190	Discuss call with expert	.10
07/16/20	K. Kolb	B190	Discuss expert questions with G. Fromer	.20



Re: **Sears Bankruptcy**

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07/16/20	S. O'Donnell	B190	Review/comment on court correspondence re BG; confer w/ team re same.	.20
07/17/20	K. Kolb	B190	Revise outlines	.70
07/20/20	L. Poretsky	B160	Review eighth fee statement and exhibits and redact private information (.7); assemble eighth fee statement (.5); prepare same for filing and e-file (.4); submit e-mail to Prime clerk re service of the eighth fee statement (.4); circulate filed eighth fee statement to the team (.2)	2.20
07/20/20	L. Schepp	B190	Update deposition kits for attorney review.	1.70
07/21/20	C. Carty	B160	Attention to issues related to fee statement.	.60
07/21/20	K. Kolb	B190	Analyze further information provided by opposing counsel	.20
07/21/20	K. Kolb	B190	Revise deposition outline	.40
07/21/20	L. Schepp	B190	Update deposition kit outlines and annotate documents for attorney review.	4.10
07/22/20	K. Kolb	B190	Discuss deposition outlines with L. Schepp	.20
07/22/20	K. Kolb	B190	Revise deposition outline	.20
07/22/20	L. Schepp	B190	Update deposition kit outlines and annotate documents for attorney review.	5.60
07/23/20	L. Schepp	B190	Update numerous deposition kit outlines	6.00



Re: **Sears Bankruptcy**

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07/24/20	L. Schepp	B190	Update numerous deposition kit outlines and annotate documents in preparation for attorney review.	6.40
07/27/20	G. Fromer	B190	Review status on Rule 2004 investigation and plan to follow up with potential deponents.	.20
07/27/20	K. Kolb	B190	Call with expert regarding additional information provided by opposing counsel	.20
07/27/20	K. Kolb	B190	Discuss and draft status update regarding investigation and subpoena responses	.40
07/30/20	G. Fromer	B190	Review notes from prior calls with Milbank and Quinn Emanuel and draft emails to follow up on information requests and next steps	.50
07/30/20	K. Kolb	B190	Email to opposing counsel regarding information requests	.20
07/31/20	G. Fromer	B190	Discuss information requests with Kramer Levin	.10
07/31/20	G. Fromer	B190	Analyze factual issues related to negotiating information requests	.40
07/31/20	G. Fromer	B190	Review call notes with expert and analyze answer to counsel's question regarding information requests	.20
07/31/20	G. Fromer	B190	Revise deposition outline to add expert's questions	.60
07/31/20	K. Kolb	B190	Call with expert and attend to related issues	.30



Re: **Sears Bankruptcy**

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07/31/20	K. Kolb	B190	Revise narrowed set of information requests	.30
07/31/20	K. Kolb	B190	Draft emails to opposing counsel	.10
07/31/20	K. Kolb	B190	Call with counsel for Barclays	.30
Total				\$34,455.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	6.40	785.00	5,024.00
K. Kolb	14.40	610.00	8,784.00
G. Fromer	14.30	420.00	6,006.00
L. Poretsky	3.70	390.00	1,443.00
L. Schepp	29.30	335.00	9,815.50
S. O'Donnell	3.30	1025.00	3,382.50

DISBURSEMENTS

Shipping	23.92
Expert Witness Fees	9,195.00
Pacer Charges	51.40
E-Discovery Data Hosting	100.00
Total disbursements	\$9,370.32



Re: **Sears Bankruptcy**

Bill Number: 358157
File Number: 19609-0001
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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Fee/Employment Applications - B160</u>		
	4.90	\$2,350.00
Subtotals	4.90	\$2,350.00
 <u>Contested Matters (exclu. assumption/rejection) - B190</u>		
	66.10	\$31,861.00
	.40	\$244.00
Subtotals	66.50	\$32,105.00



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

October 22, 2020
Invoice Number: 538311
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through September 30, 2020	\$125,889.00
Expenses posted through September 30, 2020	153,220.04
TOTAL	<u>\$279,109.04</u>
Unpaid balance from previous invoice(s)	\$199,873.37
Total Due Now	\$478,982.41

Kindly return this page with your check payment to:
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS

HERRICK, FEINSTEIN LLP • Two Park Avenue • New York, NY 10016 • Phone: 212.592.1400 • Fax: 212.592.1500



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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
08/03/20	K. Kolb	B190	Emails to expert regarding information requests	0.20
08/04/20	C. Carty	B190	Call with counsel to Cyrus in connection with Rule 2004 investigation and prepare for same.	1.10
08/04/20	C. Carty	B190	Analyze issues related to discovery in Rule 2004 investigation.	0.30
08/04/20	C. Carty	B160	Correspondence re preparation of interim fee application.	0.90
08/04/20	S. O'Donnell	B190	Coordinate 2004 meet and confer; f/up re same.	0.50
08/04/20	K. Kolb	B190	Status call with C. Carty	0.20
08/04/20	K. Kolb	B190	Call with counsel to Cyrus Capital	0.30
08/04/20	K. Kolb	B190	Call with counsel to Barclays	0.10
08/04/20	K. Kolb	B190	Draft emails to expert and opposing counsel	0.30
08/04/20	K. Kolb	B190	Revise outlines for depositions	1.70
08/04/20	G. Fromer	B190	Review comments to revise deposition outline	0.10
08/04/20	G. Fromer	B190	Discuss issues raised in Milbank call with Chris Carty and Kyle Kolb	0.20
08/04/20	G. Fromer	B190	Call with Milbank regarding additional information requests and scheduling deposition	0.20
08/04/20	H. Zimmer	B160	Confer with Chris Carty on fee applications	0.10
08/05/20	C. Carty	B160	Attention to issues related to interim fee application.	1.20
08/05/20	H. Zimmer	B160	Confer with CC, LP, KK regarding fee applications	0.10
08/05/20	L. Poretsky	B160	Requests to billing department information pertinent to second fee application	0.40
08/05/20	L. Poretsky	B160	Obtain Akin's form of the second interim fee application and review.	0.40
08/05/20	L. Poretsky	B160	Begin drafting second fee application	2.40
08/05/20	L. Poretsky	B160	Conference with Chris Carty to discuss details of the second fee application	0.30
08/06/20	C. Carty	B160	Attention to issues related to interim fee application.	0.70
08/06/20	L. Poretsky	B160	Review and analyze information received from billing department (.7); request additional information re received payments and consolidated summary of the matters per timekeeper and bankruptcy codes (.3); conference with billing department to discuss details (.3)	1.30
08/06/20	L. Poretsky	B160	Continue to draft second fee application	1.00
08/07/20	K. Kolb	B160	Initial work on fee application	0.10



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
08/07/20	L. Poretsky	B160	Working with billing department to obtain additional information pertinent to the second fee application	1.00
08/07/20	L. Poretsky	B160	Continue to draft second fee application	3.00
08/10/20	C. Carty	B160	Review and revise draft interim fee application and circulate to committee co-counsel (3.8, 1.3).	5.10
08/10/20	K. Kolb	B160	Revise fee application	0.40
08/10/20	G. Fromer	B160	Draft fee memo application for March 2020 through June 2020 for Rule 2004 Investigation	0.90
08/10/20	H. Zimmer	B160	Confer with CC and KK on fee application	0.10
08/10/20	H. Zimmer	B160	Draft fee application	0.80
08/10/20	L. Poretsky	B160	Continue to draft, revise and update second fee application (3.0); finalize the draft and submit to Chris Carty for review and comments(.4)	3.40
08/11/20	C. Carty	B190	Participate in call with litigation team re status of investigation and prepare for same.	1.20
08/11/20	C. Carty	B160	Confer with co-counsel regarding interim fee application (0.4); revise same (0.5).	0.90
08/11/20	S. O'Donnell	B190	Strategy call w/ team; review/comment on diligence list; coordinate proffers; depo prep.	1.00
08/11/20	K. Kolb	B190	Draft status list of investigation.	0.20
08/11/20	K. Kolb	B190	Call regarding testimony status	0.30
08/11/20	K. Kolb	B190	Draft emails regarding depositions and status update	0.20
08/11/20	G. Fromer	B190	Discuss case status and next steps with Sean O'Donnell, Chris Carty, and Kyle Kolb	0.30
08/11/20	G. Fromer	B190	Revise deposition outline	1.50
08/11/20	G. Fromer	B190	Revise summary of status of depositions and information requests to prepare for internal case update call	0.20
08/11/20	G. Fromer	B190	Draft email to creditors committee regarding case update and deposition strategy	0.50
08/11/20	G. Fromer	B190	Discuss schedule for depositions and case planning and strategy	0.10
08/11/20	H. Zimmer	B160	Review emails from Akin on fee application	0.10
08/11/20	L. Poretsky	B160	Review Chris Carty comments re HF second fee application	0.40
08/12/20	C. Carty	B190	Analyze issues re deposition scheduling in connection with Rule 2004 investigation.	0.50
08/12/20	S. O'Donnell	B190	Coordinate depositions; prep for same	0.50
08/12/20	S. Smith	B190	Review Sculptor depo and related email traffic.	0.40
08/12/20	K. Kolb	B190	Analyze holdings data provided by CDS Participant and discuss with expert	0.30



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
08/12/20	G. Fromer	B190	Revise email update to UCC regarding depositions	0.10
08/13/20	K. Kolb	B160	Draft further summary in response to billing inquiry	0.80
08/13/20	G. Fromer	B190	Revise deposition outline	0.20
08/14/20	K. Kolb	B190	Revise email summarizing investigation status	0.50
08/14/20	G. Fromer	B190	Revise case update summary email to UCC	0.20
08/14/20	L. Poretsky	B160	Review, revise and finalize Second HF Fee Application and exhibits (.8); prepare same for filing and e-file (.4); submit e-mail to Prime clerk re service of the Second Fee Application(.3); circulate filed Second Fee Application to the team (.2)	1.70
08/17/20	K. Kolb	B190	Analyze data from counsel and list of questions from expert	0.50
08/17/20	G. Fromer	B190	Schedule call with experts to prepare for depositions	0.10
08/18/20	C. Carty	B190	Call with CMRA re Barclays data and scheduling (0.6); prepare for depositions (1.5).	2.10
08/18/20	K. Kolb	B190	Further call with expert	0.20
08/18/20	K. Kolb	B190	Revise update email regarding investigation status	0.30
08/18/20	K. Kolb	B190	Emails to opposing counsel regarding scheduling and data provided	0.20
08/18/20	K. Kolb	B190	Call with consultants regarding depositions and related data issues	0.70
08/18/20	G. Fromer	B190	Discuss newly provided information with experts in preparation for depositions	0.60
08/18/20	G. Fromer	B190	Discuss planning and preparing for depositions with Chris Carty and Kyle Kolb	0.10
08/25/20	K. Kolb	B190	Analyze materials from expert	0.10
08/25/20	K. Kolb	B160	Analyze draft fee application	0.20
08/25/20	G. Fromer	B190	Discuss Cyrus data with expert	0.20
08/25/20	G. Fromer	B190	Send email to Chris Carty and Kyle Kolb about discussion with expert on Cyrus data	0.10
08/26/20	K. Kolb	B190	Revise outlines for interview	1.10
08/26/20	G. Fromer	B190	Discuss preparing for depositions with Kyle Kolb via email	0.20
08/27/20	S. O'Donnell	B190	Coordinate 2004 discovery.	0.20
08/27/20	K. Kolb	B190	Call with opposing counsel	0.10
08/28/20	K. Kolb	B190	Revise email to Committee with update on investigation	0.20
08/30/20	K. Kolb	B190	Further revisions to outlines	3.50
08/31/20	K. Kolb	B190	Further preparation for depositions	0.10
08/31/20	G. Fromer	B190	Review Protective Order in MTN Rule 2004 Investigation to prepare for depositions	0.80
08/31/20	G. Fromer	B190	Discuss planning and preparing for depositions via email	0.10



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			with Kyle Kolb	
09/01/20	K. Kolb	B190	Revise testimony outline for MTN investigation	4.10
09/01/20	G. Fromer	B190	Review draft and final version of Cyrus-OCO settlement agreement	0.50
09/01/20	G. Fromer	B190	Discuss preparing for depositions with Kyle Kolb via email	0.10
09/01/20	L. Schepp	B190	Update master set of chronology documents, per K. Kolb	1.60
09/02/20	S. Smith	B190	Attention to email traffic re depos and related discussion.	0.30
09/02/20	K. Kolb	B190	Communicate with expert regarding claims analysis	0.30
09/02/20	G. Fromer	B190	Draft email to OZ attorney	0.10
09/02/20	G. Fromer	B190	Email communications with expert regarding deposition prep	0.10
09/02/20	G. Fromer	B190	Discuss preparing for deposition with Kyle Kolb via email	0.10
09/02/20	L. Schepp	B190	Compile and send documents to experts at CMRA, per K. Kolb.	0.80
09/03/20	K. Kolb	B190	Further call with expert team regarding testimony strategy	0.70
09/03/20	K. Kolb	B190	Revise testimony outline further based on expert feedback	1.20
09/03/20	G. Fromer	B190	Review agenda for call with expert	0.10
09/03/20	G. Fromer	B190	Call with expert to prepare for deposition	0.50
09/04/20	C. Carty	B190	Prepare for proffer in Rule 2004 investigation.	1.20
09/08/20	K. Kolb	B190	Analyze recent 363(n) case law	0.40
09/08/20	G. Fromer	B190	Review outline for call with Stroock	0.10
09/09/20	C. Carty	B190	Prepare for proffer in Rule 2004 investigation.	0.80
09/09/20	S. O'Donnell	B190	Attend investigation process.	0.50
09/09/20	K. Kolb	B190	Revise outline	1.00
09/10/20	C. Carty	B190	Prepare for proffer in Rule 2004 investigation.	2.50
09/10/20	C. Carty	B190	Call with Herrick and CMRA teams to prepare for OZ proffer and prepare for same.	1.20
09/10/20	S. O'Donnell	B190	Confer w/ experts re OZ proffer and prep for same.	2.00
09/10/20	K. Kolb	B190	Prepare for and attend prep call with expert	1.80
09/10/20	K. Kolb	B190	Analyze expert disclosure rules	0.20
09/10/20	K. Kolb	B190	Revise testimony outline	1.30
09/10/20	G. Fromer	B190	Call with expert to prepare for call with Stroock	1.00
09/10/20	G. Fromer	B190	Review email communications to prepare for call with Stroock	0.30
09/10/20	G. Fromer	B190	Review article on the ISDA auction process	0.50
09/10/20	G. Fromer	B190	Review outline to prepare for call with Stroock	1.10



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
09/10/20	G. Fromer	B190	Review expert's comments to outline	0.10
09/10/20	G. Fromer	B190	Review Trap Rock Research memo	0.30
09/10/20	G. Fromer	B190	Review timeline of key events	0.80
09/10/20	G. Fromer	B190	Discuss call with expert with Kyle Kolb via email	0.10
09/10/20	G. Fromer	B190	Conduct legal research on FRCP Rule 26	0.50
09/11/20	C. Carty	B190	Review and analyze revised outline for proffer in Rule 2004 investigation.	1.50
09/11/20	K. Kolb	B190	Revise testimony outline	2.30
09/12/20	K. Kolb	B190	Revise testimony outline and analysis memo	0.60
09/14/20	G. Fromer	B190	Draft outline for call with Quinn Emmanuel	3.30
09/14/20	G. Fromer	B190	Communicate with expert via email with regard to preparation for call with counsel for bidders	0.20
09/14/20	G. Fromer	B190	Communicate with expert via email	0.10
09/14/20	G. Fromer	B190	Communicate with expert via email	0.10
09/15/20	C. Carty	B190	Prepare for OZ proffer in connection with Rule 2004 investigation and analyze documents related to same.	4.30
09/15/20	S. O'Donnell	B190	Prep for OZ proffer and confer w/ experts and legal team re same	2.00
09/15/20	K. Kolb	B190	Prepare for testimony and discuss with experts	2.30
09/15/20	K. Kolb	B190	Additional analysis of case law in preparation for testimony	0.30
09/15/20	G. Fromer	B190	Discuss preparation for call with Stroock with experts	0.40
09/15/20	G. Fromer	B190	Review documents produced by OZ, outline for call with Stroock, and Cyrus-OZ settlement agreement to prepare for call with Stroock	1.10
09/16/20	C. Carty	B190	Review and analyze documents in preparation for Rule 2004 proffer.	1.50
09/16/20	C. Carty	B190	Participate in Rule 2004 attorney proffer.	3.00
09/16/20	S. O'Donnell	B190	Prep and conduct OZ proffer	4.00
09/16/20	K. Kolb	B190	Prepare for interview and revise outline	1.00
09/16/20	K. Kolb	B190	Attend call with opposing counsel regarding investigation	3.00
09/16/20	G. Fromer	B190	Discuss Barclays research with Kyle Kolb via email	0.10
09/16/20	G. Fromer	B190	Set up chat with experts for call with Stroock	0.10
09/16/20	G. Fromer	B190	Discuss drafting deposition outline	0.10
09/16/20	G. Fromer	B190	Review Cyrus Data Analysis from Expert	1.80
09/16/20	G. Fromer	B190	Review Sale Motion	0.50
09/16/20	G. Fromer	B190	Review Cyrus Objection to Sale Motion	0.30
09/16/20	G. Fromer	B190	Review Omega Motion to Invalidate Sale Order	1.00
09/16/20	G. Fromer	B190	Review Notice of Hearing for Approval of Sale of MTNs	0.10



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			to Cyrus	
09/16/20	G. Fromer	B190	Review Note Purchase Agreement between Debtor and Cyrus	0.10
09/16/20	G. Fromer	B190	Review Cyrus Response	0.40
09/16/20	G. Fromer	B190	Review Order denying motion to invalidate sale	0.10
09/16/20	G. Fromer	B190	Discuss internal and expert questions during call with Stroock	0.50
09/16/20	G. Fromer	B190	Call with Stroock	2.00
09/16/20	G. Fromer	B190	Discuss call with Stroock internally	0.30
09/16/20	G. Fromer	B190	Discuss call with Stroock internally via email	0.10
09/16/20	N. Rosen	B190	Research for Kyle Kolb on potential deponent using TLO and Westlaw.	0.50
09/17/20	S. O'Donnell	B190	Confer w/ expert re OZ and depo preparation.	1.00
09/17/20	K. Kolb	B190	Revise testimony outline and analyze related documents	2.50
09/17/20	K. Kolb	B190	Revise interview summary	1.30
09/17/20	G. Fromer	B190	Review Kyle Kolb's revisions to outline for call with Quinn Emanuel	0.20
09/17/20	G. Fromer	B190	Review Quinn Bloomberg TV interview regarding MTNs and update outline for call with Omega	0.70
09/17/20	G. Fromer	B190	Review documents produced by Omega to answer Kyle Kolb's question	0.50
09/17/20	G. Fromer	B190	Review calls produced by Barclays to answer Kyle Kolb's question	0.30
09/17/20	L. Schepp	B190	Create redline of various versions of the settlement agreement	0.60
09/17/20	A. Grillo	B190	Using Dialog, Blaw, Westlaw, TLO, and LinkedIn research potential deponents and delivered results to K. Kolb.	1.50
09/17/20	N. Rosen	B190	Research for Kyle Kolb on potential deponents.	0.50
09/18/20	C. Carty	B190	Prepare for Omega attorney proffer in connection with Rule 2004 investigation and review and analyze documents related thereto.	3.10
09/18/20	S. O'Donnell	B190	Confer w/ expert re seminar and coordinate.	0.50
09/18/20	K. Kolb	B190	Analyze research into deponent	0.30
09/19/20	S. O'Donnell	B190	Prepare for deposition and confer with expert.	0.50
09/21/20	C. Carty	B190	Prepare for Omega attorney proffer in connection with Rule 2004 investigation and review and analyze documents related thereto.	2.50
09/21/20	C. Carty	B190	Call with Herrick and CMRA teams to prepare for Omega attorney proffer in connection with Rule 2004 investigation and prepare for same.	0.50



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
09/21/20	S. O'Donnell	B190	Prep for sears proffer.	1.90
09/21/20	K. Kolb	B190	Revise testimony outline	0.60
09/21/20	K. Kolb	B190	Draft initial order of proof	2.20
09/21/20	K. Kolb	B190	Review additional information from opposing counsel	0.10
09/21/20	K. Kolb	B190	Attend meeting to finalize preparations for testimony	0.40
09/21/20	K. Kolb	B190	Further review of documents produced by CDS Participants in connection with testimony preparation	0.30
09/21/20	G. Fromer	B190	Discuss Omega and OZ data with expert	0.30
09/21/20	G. Fromer	B190	Review documents produced by Barclays and Omega to answer Kyle Kolb's question	0.40
09/22/20	C. Carty	B190	Prepare for Omega attorney proffer in connection with Rule 2004 investigation and review and analyze documents related thereto.	1.50
09/22/20	C. Carty	B190	Participate in Omega attorney proffer in connection with Rule 2004 investigation and confer regarding same.	3.00
09/22/20	K. Kolb	B190	Draft order of proof	0.50
09/22/20	K. Kolb	B190	Additional research regarding conduct of 2004 deposition	0.90
09/22/20	K. Kolb	B190	Attend testimony discussion with opposing counsel	2.60
09/22/20	K. Kolb	B190	Attend to follow-up items from call with opposing counsel	0.40
09/22/20	G. Fromer	B190	Discuss drafting update memorandum to UCC	0.20
09/22/20	G. Fromer	B190	Draft investigation update memorandum to UCC	0.80
09/22/20	G. Fromer	B190	Discuss searching document production with paralegal to find documents for future depositions.	0.10
09/22/20	G. Fromer	B190	Discuss additional questions for Quinn Emanuel with Sean O'Donnell, Chris Carty, Kyle Kolb, and experts	0.10
09/22/20	G. Fromer	B190	Discuss potential claims with Sean O'Donnell, Chris Carty, Kyle Kolb, and experts	0.30
09/22/20	G. Fromer	B190	Discuss case strategy with Sean O'Donnell, Chris Carty, and Kyle Kolb via email	0.10
09/22/20	G. Fromer	B190	Revise executive summary section of potential claims memorandum	0.70
09/22/20	G. Fromer	B190	Call with Jon Pickhardt of Quinn Emanuel	2.20
09/23/20	C. Carty	B190	Call with Herrick and CMRA teams regarding attorney proffers and prepare for same.	0.80
09/23/20	S. O'Donnell	B190	Strategy call w/ expert; prep for same; f/up re same; 10 legal analysis	1.50
09/23/20	K. Kolb	B190	Discuss claims analysis with C. Carty	0.30
09/23/20	K. Kolb	B190	Discuss deposition preparation issue with L. Schepp	0.20
09/23/20	K. Kolb	B190	Additional research and review of case law regarding	1.80



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			potential claims	
09/23/20	K. Kolb	B190	Summarize legal research into conduct of Rule 2004 examinations	0.50
09/23/20	K. Kolb	B190	Call with experts regarding potential claims	0.30
09/23/20	G. Fromer	B190	Review notes from call with Stroock and draft investigation update memorandum to UCC	1.30
09/23/20	G. Fromer	B190	Review notes from call with Quinn and draft investigation update memorandum to UCC	0.10
09/23/20	G. Fromer	B190	Discuss potential claims with expert	0.30
09/23/20	G. Fromer	B190	Discuss memo update to UCC with Kyle Kolb	0.10
09/23/20	L. Schepp	B190	Compile various documents for attorney review.	3.40
09/24/20	K. Kolb	B190	Prepare for call regarding potential claims	0.20
09/25/20	C. Carty	B190	Analyze potential causes of action related to Rule 2004 investigation.	3.90
09/25/20	K. Kolb	B190	Discuss claims research with C. Carty	0.20
09/25/20	K. Kolb	B190	Revise memo to UCC regarding investigation update and recommendations	2.90
09/25/20	G. Fromer	B190	Discuss potential claims with expert via email	0.10
09/27/20	K. Kolb	B190	Revise update memo on investigation status	2.60
09/28/20	K. Kolb	B190	Revise memo to UCC regarding investigation status	0.50
09/28/20	L. Schepp	B190	Revise index of BWIC and OWIC index in preparation for attorney review.	0.60
09/29/20	S. O'Donnell	B190	10b5/traprock analysis	0.50
09/29/20	K. Kolb	B190	Analyze documents regarding chronology of CDS market offers	0.30
09/29/20	K. Kolb	B190	Finalize revisions to memo to UCC regarding investigation	2.40
09/29/20	G. Fromer	B190	Discuss document reivew with paralegal	0.10
09/29/20	G. Fromer	B190	Proofread and revise memorandum update to UCC	1.00
09/29/20	L. Schepp	B190	Update document production index in preparation for attorney review.	0.40
09/30/20	C. Carty	B190	Meeting with CMRA regarging CDS derivatives and ISDA auction overview.	1.50
09/30/20	C. Carty	B190	Review and analyze case law regarding potential claims related to Rule 2004 investigation and discuss same with Herrick team and CMRA.	1.80
09/30/20	S. O'Donnell	B190	Prep and attend expert seminar.	1.50
09/30/20	S. O'Donnell	B190	Following up analysis and calls re: same.	1.00
09/30/20	S. O'Donnell	B190	Analysis of potential claims	1.00
09/30/20	S. Selbst	B190	Attend presentation on derivatives with Peter Niculescu.	1.70



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
09/30/20	K. Kolb	B190	Attend call with experts regarding background on derivatives market and discussion of potential legal theories	3.50
09/30/20	G. Fromer	B190	Participate in seminar hosted by experts on the CDS market	1.20
09/30/20	G. Fromer	B190	Discussion of the ISDA auction with experts	0.50
09/30/20	G. Fromer	B190	Discuss potential claims and data with experts	0.40
09/30/20	S. Stockman	B190	Attend webinar regarding Cyrus strategy.	1.90
09/30/20	L. Schepp	B190	Attend CMRA webex regarding CDS and ISDA auction process.	2.50
			TOTAL	\$125,421.00



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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	48.60	785.00	38,151.00
G. Fromer	37.70	420.00	15,834.00
A. Grillo	1.50	250.00	375.00
K. Kolb	61.10	610.00	37,271.00
S. O'Donnell	20.10	1,025.00	20,602.50
L. Poretsky	15.30	390.00	5,967.00
N. Rosen	1.00	320.00	320.00
L. Schepp	9.90	335.00	3,316.50
S. Selbst	1.70	1,000.00	1,700.00
S. Smith	0.70	765.00	535.50
S. Stockman	1.90	435.00	826.50
H. Zimmer	1.20	435.00	522.00
TOTAL	200.70		\$125,421.00

MANAGING ATTORNEY'S OFFICE

Electronic/Paper Filing	82.00
Procedural Advice - Federal, NY & NJ	82.00
TOTAL	\$164.00

E-DISCOVERY & LITIGATION SUPPORT SERVICES

Project Management	304.00
TOTAL	\$304.00

TOTAL LEGAL SERVICES **\$125,889.00**

DISBURSEMENTS:

	<u>AMOUNT</u>
Duplication	1,343.64
E-Discovery Data Hosting	215.00
Expert Witness Fees	151,330.00
Online Research	147.42
Postage & Shipping	133.98
Professional Services	50.00



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AMOUNT

TOTAL: \$153,220.04

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	27.90	14,772.00
B190	Other Contested Matters	174.00	111,117.00
TOTALS		201.90	\$125,889.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
354102	04/20/20	23,692.04	18,975.54	4,716.50
355261	05/29/20	113,746.72	103,232.62	10,514.10
356215	06/30/20	78,000.27	0.00	78,000.27
356647	07/16/20	62,817.18	0.00	62,817.18
358157	08/24/20	43,825.32	0.00	43,825.32
Total Outstanding				\$199,873.37



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

November 12, 2020
Invoice Number: 539160
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through October 31, 2020	\$14,236.00
Expenses posted through October 31, 2020	10,093.85
TOTAL	<u>\$24,329.85</u>
Unpaid balance from previous invoice(s)	\$478,982.41
Total Due Now	\$503,312.26

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2 Park Avenue
New York, NY 10016

Send wire payments to:
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PLEASE REMIT PAYMENT WITHIN 30 DAYS

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Invoice Number: 539160
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/02/20	K. Kolb	B190	Research work product privilege issue in connection with deposition preparation	0.20
10/02/20	K. Kolb	B190	Analyze further information provided by opposing counsel	0.10
10/03/20	K. Kolb	B190	Analyze privilege logs and scope of prior ESI collection in connection with preparing for Cyrus deposition	0.60
10/04/20	K. Kolb	B190	Revise summary of potential claims	1.00
10/05/20	S. Smith	B190	Review discovery efiles and attention to and review of emails with K. Kolb.	0.90
10/05/20	K. Kolb	B190	Revise memo to UCC regarding potential claims	1.30
10/05/20	M. Sekowski	B190	Review file re: search term issues and correspondence with K. Kolb and S. Smith re: same	0.60
10/06/20	K. Kolb	B190	Analyze expert commentary on financial data from opposing counsel	0.30
10/07/20	M. Sekowski	B190	Review file re: search term issues and telephone call to S. Smith re: same	0.40
10/08/20	S. Smith	B190	T/C with M. Sekowski re discovery issues.	0.30
10/08/20	M. Sekowski	B190	Telephone conference with S. Smith re: search term history and review	0.30
10/09/20	K. Kolb	B190	Discuss deposition progress with C. Carty	0.10
10/11/20	K. Kolb	B190	Revise memo to UCC regarding investigation	0.40
10/11/20	K. Kolb	B190	Analyze memo from expert team regarding exposure information	0.20
10/12/20	K. Kolb	B190	Revise update memo based on feedback from expert team	0.50
10/13/20	S. O'Donnell	B190	Review/comment on update to steering committee re cyrus claims; present same; coordinate Barclays proffer	0.80
10/13/20	K. Kolb	B190	Further revisions to memo to UCC	0.20
10/13/20	K. Kolb	B190	Attend update call with committee members	0.80
10/14/20	C. Carty	B190	Team strategy call regarding investigation and prepare for same.	0.70
10/14/20	K. Kolb	B190	Discuss case strategy with C. Carty and G. Fromer	0.30
10/14/20	G. Fromer	B190	Discuss case strategy and next steps with Kyle Kolb and Chris Carty	0.30
10/15/20	S. O'Donnell	B190	Strategy call w/ team.	0.50
10/15/20	K. Kolb	B190	Prepare for additional proffer and case analysis discussion	0.30



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/15/20	G. Fromer	B190	Discuss case strategy and next steps with Sean O'Donnell, Chris Carty, and Kyle Kolb	0.20
10/16/20	K. Kolb	B190	Prepare topic list for further depositions	0.40
10/16/20	G. Fromer	B190	Draft topic list to prepare for questioning bidder	1.00
10/16/20	G. Fromer	B190	Email Chris Carty regarding topic list for questioning bidder	0.10
10/19/20	C. Carty	B190	Call with counsel to Barclays regarding investigation next steps.	0.30
10/19/20	K. Kolb	B190	Prepare for and attend call with opposing counsel regarding next steps in investigation	0.60
10/20/20	S. O'Donnell	B190	UCC memo and proffer coordination.	0.50
10/20/20	S. O'Donnell	B190	Outline of same.	0.50
10/26/20	C. Carty	B160	Attention to issues related to fee applications.	0.80
10/26/20	S. Stockman	B190	Continue 2LR review.	4.60
10/28/20	G. Fromer	B190	Discuss deposition outlines with Kyle Kolb via email	0.10
10/28/20	G. Fromer	B190	Draft deposition outline	0.70
10/30/20	L. Poretsky	B160	Revise, redact, finalize and e-file Tenth Monthly Fee Statement; submit to Prime Clerk for service; circulate filed copy to the team	1.50
10/31/20	K. Kolb	B190	Draft complaint	1.00
TOTAL				\$14,236.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	1.80	785.00	1,413.00
G. Fromer	2.40	420.00	1,008.00
K. Kolb	8.30	610.00	5,063.00
S. O'Donnell	2.30	1,025.00	2,357.50
L. Poretsky	1.50	390.00	585.00
M. Sekowski	1.30	685.00	890.50
S. Smith	1.20	765.00	918.00
S. Stockman	4.60	435.00	2,001.00
TOTAL	23.40		\$14,236.00

DISBURSEMENTS:

AMOUNT



HERRICK

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	<u>AMOUNT</u>
E-Discovery Data Hosting	115.00
Expert Witness Fees	9,195.00
Online Research	783.85
TOTAL:	<u>\$10,093.85</u>

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	2.30	1,213.00
B190	Other Contested Matters	21.10	13,023.00
TOTALS		23.40	\$14,236.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
354102	04/20/20	23,692.04	18,975.54	4,716.50
355261	05/29/20	113,746.72	103,232.62	10,514.10
356215	06/30/20	78,000.27	0.00	78,000.27
356647	07/16/20	62,817.18	0.00	62,817.18
358157	08/24/20	43,825.32	0.00	43,825.32
538311	10/22/20	279,109.04	0.00	279,109.04
Total Outstanding				\$478,982.41



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

December 14, 2020
Invoice Number: 540575
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through November 30, 2020	\$16,609.00
Expenses posted through November 30, 2020	15,331.28
TOTAL	<u>\$31,940.28</u>
Unpaid balance from previous invoice(s)	\$36,984.50
Total Due Now	\$68,924.78

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2 Park Avenue
New York, NY 10016

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Citibank, N.A.
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Account Number: 6165
SWIFT #: US33

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HERRICK

Invoice Number: 540575
Matter Number: 19609.0001
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/05/20	K. Kolb	B190	Draft outline of potential claims.	0.80
11/05/20	G. Fromer	B190	Draft deposition outline and email Kyle Kolb regarding the same.	2.40
11/05/20	G. Fromer	B190	Email Linda Schepp regarding gathering exhibits cited in deposition outline.	0.10
11/05/20	L. Schepp	B190	Compile cited exhibits in Omega's Objections for attorney review.	2.30
11/06/20	G. Fromer	B190	Email paralegal regarding exhibits for deposition outline.	0.10
11/06/20	L. Schepp	B190	Compile additional documents for Barclays proffer.	0.70
11/09/20	K. Kolb	B190	Analyze draft deposition outline.	0.20
11/12/20	C. Carty	B160	Review and comment on fee statement.	0.50
11/13/20	L. Poretsky	B160	Revise, redact and finalize Eleventh Monthly Fee Statement and e-file; e-mail to Prime Clerk to request service of the filed statement.	1.00
11/17/20	K. Kolb	B190	Revise Barclays outline.	1.00
11/17/20	K. Kolb	B190	Revise memo regarding investigation status.	1.20
11/17/20	G. Fromer	B190	Email Kyle Kolb regarding deposition exhibits.	0.10
11/18/20	K. Kolb	B190	Revise Barclays deposition materials.	2.20
11/18/20	G. Fromer	B190	Review revisions to deposition outline.	0.10
11/19/20	K. Kolb	B190	Draft witness affidavits for use in investigation.	2.60
11/19/20	G. Fromer	B190	Review relevant documents and revise deposition outline.	3.20
11/19/20	G. Fromer	B190	Discuss deposition timeline and strategy with Kyle Kolb.	0.10
11/19/20	L. Schepp	B190	Update documents in the Barclays proffer.	0.90
11/20/20	K. Kolb	B190	Draft affidavit for use in investigation.	1.20
11/20/20	G. Fromer	B190	Revise Affirmation.	0.80
11/23/20	K. Kolb	B190	Draft additional affidavit for consideration in investigation.	0.90
11/23/20	K. Kolb	B190	Emails with opposing counsel regarding proffer.	0.20
11/24/20	C. Carty	B160	Analyze issues related to Sears fee statements and interim fee application.	3.20
11/29/20	K. Kolb	B190	Revise deposition outline.	0.40
11/30/20	C. Carty	B160	Analyze issues related to Sears fee statements and interim fee application; call with M-III re same.	2.20
11/30/20	K. Kolb	B190	Revise deposition outline.	0.40
11/30/20	K. Kolb	B190	Revise affidavit for use in investigation.	0.30



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Invoice Number: 540575
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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/30/20	L. Poretsky	B160	Review information needed for the third fee application, prepare and submit request to billing department for information related to the third fee application; begin drafting third fee application.	1.10
TOTAL				\$16,609.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	5.90	785.00	4,631.50
G. Fromer	6.90	420.00	2,898.00
K. Kolb	11.40	610.00	6,954.00
L. Poretsky	2.10	390.00	819.00
L. Schepp	3.90	335.00	1,306.50
TOTAL	30.20		\$16,609.00

DISBURSEMENTS:

	<u>AMOUNT</u>
Duplication	2.52
E-Discovery Data Hosting	115.00
Expert Witness Fees	15,075.00
Online Research	32.46
Other	70.00
Pacer Charges	36.30
TOTAL:	\$15,331.28

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	8.00	5,450.50
B190	Other Contested Matters	22.20	11,158.50
TOTALS		30.20	\$16,609.00



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PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
356647	07/16/20	62,817.18	60,748.68	2,068.50
358157	08/24/20	43,825.32	36,934.32	6,891.00
538311	10/22/20	279,109.04	253,931.24	25,177.80
539160	11/12/20	24,329.85	21,482.65	2,847.20
Total Outstanding				\$36,984.50



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

January 19, 2021
Invoice Number: 541327
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through December 31, 2020	\$36,261.00
Expenses posted through December 31, 2020	15,672.19
TOTAL	<u>\$51,933.19</u>
Unpaid balance from previous invoice(s)	\$40,306.30
Total Due Now	\$92,239.49

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New York, NY 10016

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HERRICK

Invoice Number: 541327
Matter Number: 19609.0001
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
12/01/20	C. Carty	B190	Analyze issues related to Barclays proffer.	0.80
12/01/20	S. O'Donnell	B190	Coordinate Barclays proffer.	0.50
12/01/20	K. Kolb	B190	Call with expert regarding data analysis.	0.60
12/01/20	K. Kolb	B190	Revise outline for proffer.	0.30
12/01/20	L. Poretsky	B160	Conference with billing department re details of the summaries related to third fee application; continue third fee application;	1.50
12/02/20	C. Carty	B160	Attention to issues related to fee statements and interim fee application.	2.50
12/02/20	K. Kolb	B190	Revise proffer outline.	1.50
12/02/20	K. Kolb	B160	Draft insert for fee application.	0.30
12/02/20	K. Kolb	B190	Further revisions to proffer outline.	0.20
12/02/20	G. Fromer	B190	Email Kyle Kolb about revising deposition outline.	0.10
12/02/20	G. Fromer	B190	Review Kyle Kolb's revisions to deposition outline.	0.10
12/02/20	L. Poretsky	B160	Continue to review documents relevant to the Third Fee Application, calculate and draft summaries of the Third Fee application; conference with billing department to obtain summaries of data required for the draft of the fee applications;	4.40
12/02/20	L. Schepp	B190	Locate various OWICs for attorney review for Barclay's proffer.	0.80
12/03/20	C. Carty	B160	Attention to issues related to fee statements and interim fee application.	0.70
12/03/20	K. Kolb	B190	Analyze potential additional documents for use in depositions.	0.30
12/03/20	L. Poretsky	B160	Continue drafting third fee application	3.00
12/03/20	L. Poretsky	B160	Review and analyze reports received from billing department , request to re-run to comply with fee application guidance	0.80
12/04/20	C. Carty	B160	Attention to issues related to fee statements and interim fee application.	1.20
12/04/20	L. Poretsky	B160	Analyze billing reports, calculate and update third fee application	3.00
12/04/20	L. Schepp	B190	Identify additional OWICs in document production for attorney review.	0.40
12/07/20	G. Fromer	B190	Email Kyle Kolb and paralegal regarding preparation for deposition.	0.10
12/07/20	L. Poretsky	B160	Review various billing details and summaries received	4.40



HERRICK

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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			from billing department; recalculate summary charts; conference with billing department re discrepancies in the calculations; continue draft third fee application and prepare exhibits;	
12/07/20	L. Poretsky	B160	Review C. Carty comments to the draft of Third Fee Application and make changes	1.00
12/07/20	L. Schepp	B190	Compile additional OWIC related documents.	0.70
12/08/20	C. Carty	B160	Review and revise draft third interim fee application.	1.20
12/08/20	L. Poretsky	B160	Conference with billing department to discuss discrepancies related to the draft of the third fee application	0.40
12/09/20	K. Kolb	B190	Analyze memo provided to experts, incorporate into outline, and analyze additional related documents.	2.20
12/09/20	G. Fromer	B190	Review deposition outline.	0.70
12/09/20	G. Fromer	B190	Discuss deposition preparation with Kyle Kolb.	0.10
12/09/20	G. Fromer	B190	Review and annotate deposition exhibits.	0.80
12/09/20	L. Poretsky	B160	Analyze current billing summaries to ensure accuracy and consistency;	0.60
12/09/20	L. Poretsky	B160	Review C. Carty comments to the draft of the third fee application and revise	0.90
12/09/20	L. Poretsky	B160	Calculate per updated summaries received from billing department, update and finalize third fee application	2.40
12/09/20	L. Schepp	B190	Update documents cited in Barclays' proffer in preparation for attorney review.	4.20
12/10/20	C. Carty	B160	Review and revise draft third interim fee application.	2.20
12/10/20	K. Kolb	B190	Revise proffer outline.	1.20
12/10/20	K. Kolb	B190	Analyze revisions to proffer outline and materials.	0.30
12/10/20	K. Kolb	B190	Revise materials for proffer.	0.20
12/10/20	G. Fromer	B190	Discuss preparing deposition exhibit binder with paralegal.	0.20
12/11/20	C. Carty	B160	Revise and finalize third interim fee app.	1.10
12/11/20	K. Kolb	B190	Revise proffer materials	1.20
12/11/20	L. Poretsky	B160	Conference with Chris Carty re status if the third fee application and filing options	0.30
12/11/20	L. Schepp	B190	Revise Barclays proffer in preparation for attorney review..	1.50
12/14/20	C. Carty	B190	Prepare for Barclays proffer.	1.50
12/14/20	S. O'Donnell	B190	Coordinate proffer call.	0.50
12/14/20	L. Poretsky	B160	Revise, redact and finalize Twelfth Monthly Fee application and e-file; e-mail to Prime Clerk re service of the filed statement	1.00



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
12/15/20	C. Carty	B160	Finalize and file third interim fee application.	0.80
12/15/20	C. Carty	B190	Participate in prep session for Barclays proffer and prepare for same (1.0); review and analyze documents related to same (2.1).	3.10
12/15/20	S. O'Donnell	B190	Coordinate Barclays proffer call.	0.50
12/15/20	K. Kolb	B190	Final revisions to proffer outline.	0.30
12/15/20	K. Kolb	B190	Prepare for and attend session to prepare for proffer.	1.20
12/15/20	K. Kolb	B190	Call with opposing counsel.	0.10
12/15/20	G. Fromer	B190	Review deposition outline and expert memorandum regarding data to prepare for call with opposing counsel.	1.80
12/15/20	G. Fromer	B190	Discuss data with expert to prepare for call with opposing counsel.	0.50
12/15/20	G. Fromer	B190	Discuss deposition exhibits with Kyle Kolb.	0.10
12/16/20	K. Kolb	B190	Draft email to opposing counsel regarding data analysis.	0.30
12/21/20	C. Carty	B160	Review and analyze documentation from fee examiner.	0.70
12/22/20	C. Carty	B160	Attention to issues related to fee applications for fee examiner request.	1.40
12/28/20	K. Kolb	B190	Discuss logistical issues with opposing counsel and experts.	0.10
12/28/20	L. Schepp	B190	Compile additional documents of interest for review, per H. Zimmer	0.80
12/29/20	C. Carty	B160	Call with fee examiner and prepare for same.	0.80
TOTAL				\$35,897.50



HERRICK

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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	18.00	785.00	14,130.00
G. Fromer	4.50	420.00	1,890.00
K. Kolb	10.30	610.00	6,283.00
S. O'Donnell	1.50	1,025.00	1,537.50
L. Poretsky	23.70	390.00	9,243.00
L. Schepp	8.40	335.00	2,814.00
TOTAL	66.40		\$35,897.50

MANAGING ATTORNEY'S OFFICE

Electronic/Paper Filing	97.50
TOTAL	\$97.50

E-DISCOVERY & LITIGATION SUPPORT SERVICES

Document Production	190.00
Project Management	76.00
TOTAL	\$266.00

TOTAL LEGAL SERVICES	\$36,261.00
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DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	115.00
Expert Witness Fees	15,450.00
Postage & Shipping	107.19
TOTAL:	<u>\$15,672.19</u>

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B110	Case Administration	1.00	363.50



HERRICK

Invoice Number: 541327
Matter Number: 19609.0001
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TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	36.60	19,317.00
B190	Other Contested Matters	29.80	16,580.50
TOTALS		67.40	\$36,261.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
356647	07/16/20	62,817.18	60,748.68	2,068.50
358157	08/24/20	43,825.32	36,934.32	6,891.00
538311	10/22/20	279,109.04	253,931.24	25,177.80
539160	11/12/20	24,329.85	21,482.65	2,847.20
540575	12/14/20	31,940.28	28,618.48	3,321.80
			Total Outstanding	\$40,306.30



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

February 24, 2021
Invoice Number: 542957
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through January 31, 2021	\$29,145.50
Expenses posted through January 31, 2021	8,914.20
TOTAL	<u>\$38,059.70</u>
Unpaid balance from previous invoice(s)	\$92,239.49
Total Due Now	\$130,299.19

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Invoice Number: 542957
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
01/11/21	C. Carty	B190	Prepare for Barclays proffer in connection with Rule 2004 investigation.	1.80
01/11/21	K. Kolb	B190	Prepare for proffer and review outline and related documents.	1.20
01/12/21	K. Kolb	B190	Further review of key documents produced in response to subpoenas.	0.30
01/12/21	K. Kolb	B190	Prepare for investigation interview.	0.90
01/12/21	G. Fromer	B190	Revise deposition outline.	1.80
01/12/21	G. Fromer	B190	Discuss preparations for call with Kramer Levin with Chris Carty, Kyle Kolb, and expert.	0.20
01/13/21	C. Carty	B190	Prepare for Barclays proffer; attention to issues related to scheduling.	2.20
01/13/21	C. Carty	B160	Provide fee forecast to M3.	0.40
01/13/21	K. Kolb	B190	Revise outline and analyze materials for proffer.	1.70
01/13/21	G. Fromer	B190	Review Barclays calls and prepare for call with Kramer Levin.	0.60
01/13/21	G. Fromer	B190	Review court filings and emails and revise deposition outline.	3.60
01/14/21	S. O'Donnell	B190	Prep for Barclays proffer,	1.50
01/15/21	C. Carty	B190	Prepare for Barclays attorney proffer (1.6); take Barclays attorney proffer (2.0).	3.60
01/15/21	S. O'Donnell	B190	Prep (outline and doc review) and participate in Barclays proffer; f/up analysis re same	3.50
01/15/21	K. Kolb	B190	Prepare for proffer session.	0.30
01/15/21	K. Kolb	B190	Attend and conduct proffer in connection with investigation.	3.00
01/15/21	G. Fromer	B190	Prepare for call with Kramer Levin.	0.50
01/15/21	G. Fromer	B190	Discussion with Kramer Levin.	2.10
01/18/21	S. O'Donnell	B190	Dic review/analysis; confer w/ CC; prep for lit designee call; conduct same; f/up analysis and calls re same.	3.00
01/20/21	K. Kolb	B190	Discuss investigation status and strategy with C. Carty.	0.40
01/21/21	K. Kolb	B190	Revise update memo to UCC regarding status of investigation.	1.40
01/21/21	K. Kolb	B190	Analyze confirmation order and plan to analyze legal issues in connection with investigation.	1.30
01/21/21	G. Fromer	B190	Revise memorandum to UCC regarding MTN investigation.	1.80



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Invoice Number: 542957
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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
01/22/21	K. Kolb	B190	Draft summary of analysis of plan and legal issue and update to UCC.	0.70
01/22/21	G. Fromer	B190	Review email from K. Kolb regarding case strategy.	0.10
01/22/21	L. Poretsky	B160	Review and revise Thirteenth Monthly Fee Statement, assemble exhibits, redact private information, e-file, and submit to Prime Clerk for service; circulate objection deadline	1.10
01/23/21	S. O'Donnell	B190	Attend to investigation status.	0.30
01/26/21	C. Carty	B160	Attention to issues regarding fee statements.	0.20
			TOTAL	\$28,993.50



HERRICK

Invoice Number: 542957
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	8.20	850.00	6,970.00
G. Fromer	10.70	460.00	4,922.00
K. Kolb	11.20	690.00	7,728.00
S. O'Donnell	8.30	1,075.00	8,922.50
L. Poretsky	1.10	410.00	451.00
TOTAL	39.50		\$28,993.50

E-DISCOVERY & LITIGATION SUPPORT SERVICES

Project Management	152.00
TOTAL	\$152.00

TOTAL LEGAL SERVICES **\$29,145.50**

DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
Expert Witness Fees	8,770.00
Pacer Charges	44.20
TOTAL:	<u>\$8,914.20</u>

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.70	961.00
B190	Other Contested Matters	38.20	28,184.50
TOTALS		39.90	\$29,145.50



Invoice Number: 542957
Matter Number: 19609.0001
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PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
356647	07/16/20	62,817.18	60,748.68	2,068.50
358157	08/24/20	43,825.32	36,934.32	6,891.00
538311	10/22/20	279,109.04	253,931.24	25,177.80
539160	11/12/20	24,329.85	21,482.65	2,847.20
540575	12/14/20	31,940.28	28,618.48	3,321.80
541327	01/19/21	51,933.19	0.00	51,933.19
Total Outstanding				\$92,239.49



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

March 25, 2021
Invoice Number: 544217
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through February 28, 2021	\$3,863.00
Expenses posted through February 28, 2021	200.00
TOTAL	<u>\$4,063.00</u>
Unpaid balance from previous invoice(s)	\$85,618.20
Total Due Now	\$89,681.20

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Invoice Number: 544217
Matter Number: 19609.0001
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
02/02/21	C. Carty	B160	Review draft order re interim fee applications and comment on same.	0.40
02/03/21	C. Carty	B190	Meet with K. Kolb regarding Rule 2004 investigation status.	0.40
02/03/21	K. Kolb	B190	Discuss committee update with C. Carty.	0.20
02/03/21	K. Kolb	B190	Revise proposed draft affidavit regarding investigation facts.	0.40
02/04/21	K. Kolb	B190	Discuss investigation background with H. Zimmer.	0.70
02/04/21	G. Fromer	B190	Discuss case strategy with Kyle Kolb.	0.20
02/04/21	H. Zimmer	B190	Confer with KK on case background and analyze memoranda outlining background of case.	0.70
02/04/21	H. Zimmer	B190	Analyze background materials, including memoranda and declaration on claims analysis, investigation.	1.30
02/22/21	C. Carty	B160	Prepare for omnibus hearing re interim fee applications.	0.60
02/23/21	C. Carty	B160	Prepare for hearing on interim fee application.	0.50
02/24/21	K. Kolb	B190	Analyze email from opposing counsel regarding investigation requests.	0.10
TOTAL				\$3,623.00



HERRICK

Invoice Number: 544217
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	1.90	850.00	1,615.00
G. Fromer	0.20	460.00	92.00
K. Kolb	1.40	690.00	966.00
H. Zimmer	2.00	475.00	950.00
TOTAL	5.50		\$3,623.00

E-DISCOVERY & LITIGATION SUPPORT SERVICES

Project Management	240.00
TOTAL	\$240.00

TOTAL LEGAL SERVICES **\$3,863.00**

DISBURSEMENTS:

	<u>AMOUNT</u>
Document Processing	100.00
E-Discovery Data Hosting	100.00
TOTAL:	\$200.00

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B110	Case Administration	0.60	240.00
B160	Fee/Employment Applications	1.50	1,275.00
B190	Other Contested Matters	4.00	2,348.00
TOTALS		6.10	\$3,863.00



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PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
356647	07/16/20	62,817.18	60,748.68	2,068.50
358157	08/24/20	43,825.32	36,934.32	6,891.00
538311	10/22/20	279,109.04	253,931.24	25,177.80
539160	11/12/20	24,329.85	21,482.65	2,847.20
540575	12/14/20	31,940.28	28,618.48	3,321.80
541327	01/19/21	51,933.19	44,680.99	7,252.20
542957	02/24/21	38,059.70	0.00	38,059.70
Total Outstanding				\$85,618.20



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

April 30, 2021
Invoice Number: 545915
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through March 31, 2021	\$9,532.00
Expenses posted through March 31, 2021	100.00
TOTAL	<u>\$9,632.00</u>
Unpaid balance from previous invoice(s)	\$22,534.60
Total Due Now	\$32,166.60

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HERRICK

Invoice Number: 545915
Matter Number: 19609.0001
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
03/03/21	C. Carty	B160	Review and approve fee statement.	0.10
03/03/21	L. Poretsky	B160	Assemble, redact, e-file HF Fourteenth Monthly Fee Statement and submit to Prime Clerk for service.	1.20
03/05/21	C. Carty	B190	Review and comment on draft investigation memo.	1.20
03/05/21	K. Kolb	B190	Analyze materials received from Kramer Levin.	0.50
03/05/21	K. Kolb	B190	Analyze recent 363(n) Case law in connection with investigation recommendation.	0.20
03/05/21	K. Kolb	B190	Revise recommendation memo to UCC.	1.70
03/11/21	C. Carty	B190	Review and provide comments to draft investigation memo.	2.40
03/11/21	K. Kolb	B190	Discuss update to UCC with C. Carty.	0.30
03/19/21	C. Carty	B190	Review and comment on draft investigation memo.	1.30
03/29/21	C. Carty	B190	Review and comment on investigation summary memo and review and analyze documents referenced therein.	3.20
03/29/21	K. Kolb	B190	Analyze revisions to memo to UCC regarding investigation status.	0.30
TOTAL				\$9,532.00



HERRICK

Invoice Number: 545915
Matter Number: 19609.0001
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	8.20	850.00	6,970.00
K. Kolb	3.00	690.00	2,070.00
L. Poretsky	1.20	410.00	492.00
TOTAL	12.40		\$9,532.00

DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
TOTAL:	<u>\$100.00</u>

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.30	577.00
B190	Other Contested Matters	11.10	8,955.00
TOTALS		12.40	\$9,532.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
356647	07/16/20	62,817.18	60,748.68	2,068.50
540575	12/14/20	31,940.28	28,618.48	3,321.80
541327	01/19/21	51,933.19	44,680.99	7,252.20
542957	02/24/21	38,059.70	32,230.60	5,829.10
544217	03/25/21	4,063.00	0.00	4,063.00
Total Outstanding				\$22,534.60



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

May 25, 2021
Invoice Number: 546768
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through April 30, 2021	\$19,493.50
Expenses posted through April 30, 2021	107.10
TOTAL	<u>\$19,600.60</u>
Unpaid balance from previous invoice(s)	\$32,166.60
Total Due Now	\$51,767.20

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Invoice Number: 546768
Matter Number: 19609.0001
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
04/05/21	C. Carty	B190	Draft and revise memo to UCC regarding investigation.	3.10
04/05/21	S. O'Donnell	B190	Review and comment on memo.	1.50
04/06/21	L. Poretsky	B160	Assemble, redact, finalize and e-file Fifteenth Monthly Fee Statement; prepare for service and submit to Prime clerk for service.	1.20
04/07/21	L. Poretsky	B160	Review C. Carty e-mail re draft of the fourth fee application; Prepare and submit request to accounting for billing reports from November 2020 to February 2021.	0.40
04/08/21	C. Carty	B190	Revise draft investigation update memo.	1.10
04/08/21	L. Poretsky	B160	Draft fourth interim fee application.	2.20
04/08/21	L. Poretsky	B160	Analyze previously filed monthly statements to obtain information for the fourth fee application.	1.00
04/09/21	C. Carty	B160	Attention to draft interim fee application.	0.60
04/09/21	L. Poretsky	B160	Draft fourth fee application.	3.30
04/12/21	C. Carty	B160	Review and revise portions of interim fee application.	2.10
04/12/21	L. Poretsky	B160	Continue draft and revise fourth fee application.	4.00
04/13/21	C. Carty	B160	Revise draft interim fee application.	1.20
04/13/21	L. Poretsky	B160	Revise and finalize fourth fee application per C. Carty comments and circulate for review.	0.60
04/14/21	C. Carty	B160	Revise and finalize interim fee application.	0.50
04/14/21	L. Poretsky	B160	Proof read fourth fee application to ensure accuracy; prepare fourth fee application for filing and e-file; e-mail Prime Clerk copy of the filed application for service and discuss same.	1.40
04/26/21	L. Schepp	B190	Compile documents cited in UCC memorandum in preparation for attorney review.	3.80
04/27/21	K. Kolb	B190	Revise memorandum regarding investigation.	0.90
04/27/21	G. Fromer	B190	Review memorandum to UCC and email K. Kolb regarding the same.	0.20
04/27/21	G. Fromer	B190	Review discovery.	0.40
04/27/21	G. Fromer	B190	Proofread memorandum to UCC.	1.70
04/27/21	L. Schepp	B190	Finalize documents cited in UCC client memorandum.	4.30
04/28/21	K. Kolb	B190	Revise update memo to UCC regarding investigation.	0.40
TOTAL				\$19,493.50



HERRICK

Invoice Number: 546768
Matter Number: 19609.0001
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	8.60	850.00	7,310.00
G. Fromer	2.30	460.00	1,058.00
K. Kolb	1.30	690.00	897.00
S. O'Donnell	1.50	1,075.00	1,612.50
L. Poretsky	14.10	410.00	5,781.00
L. Schepp	8.10	350.00	2,835.00
TOTAL	35.90		\$19,493.50

DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
Pacer Charges	7.10
TOTAL:	<u>\$107.10</u>

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	18.50	9,521.00
B190	Other Contested Matters	17.40	9,972.50
TOTALS		35.90	\$19,493.50

PREVIOUS BILLS OUTSTANDING



Invoice Number: 546768
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<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
356647	07/16/20	62,817.18	60,748.68	2,068.50
540575	12/14/20	31,940.28	28,618.48	3,321.80
541327	01/19/21	51,933.19	44,680.99	7,252.20
542957	02/24/21	38,059.70	32,230.60	5,829.10
544217	03/25/21	4,063.00	0.00	4,063.00
545915	04/30/21	9,632.00	0.00	9,632.00
Total Outstanding				\$32,166.60



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

June 16, 2021
Invoice Number: 547628
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through May 31, 2021	\$16,239.50
Expenses posted through May 31, 2021	67.16
TOTAL	<u>\$16,306.66</u>
Unpaid balance from previous invoice(s)	\$40,751.20
Total Due Now	\$57,057.86

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HERRICK

Invoice Number: 547628
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
05/04/21	C. Carty	B190	Revise and finalize memorandum to UCC regarding findings in MTN investigation.	2.40
05/06/21	L. Poretsky	B160	Revise, assemble, reduct and e-file HF Sixteenth Monthly Fee Statement and submit to Prime Clerk for service	1.30
05/11/21	K. Kolb	B190	Analyze additional information from Barclays' counsel.	0.10
05/14/21	C. Carty	B190	Call with S. Brauner regarding MTN investigation update.	0.30
05/17/21	K. Kolb	B190	Revise affidavit.	0.60
05/17/21	K. Kolb	B190	Revise memo to UCC regarding investigation.	1.00
05/18/21	K. Kolb	B190	Revise memo to UCC and proposed affidavit.	0.70
05/19/21	K. Kolb	B190	Revise memo to UCC.	0.30
05/20/21	C. Carty	B190	Revise draft update memo to UCC based on comments received from UCC counsel.	1.10
05/20/21	K. Kolb	B190	Further revisions to memo based off feedback from C. Carty.	0.60
05/25/21	C. Carty	B160	Attend Sears omnibus hearing regarding interim fee applications and other matters.	2.10
05/28/21	C. Carty	B190	Participate in call with UCC counsel regarding MTN investigation status and next steps (0.7); prepare for same and review and analyze investigation memo and related materials (2.5).	3.20
05/28/21	S. O'Donnell	B190	Prep and conduct strategy call w/ Akin; precalls re same.	3.50
05/28/21	K. Kolb	B190	Analyze memo to UCC and related documents and case law in preparation for update call.	2.10
05/28/21	K. Kolb	B190	Attend call with Akin Gump regarding recommendation.	0.70
			TOTAL	\$16,239.50



HERRICK

Invoice Number: 547628
Matter Number: 19609.0001
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	9.10	850.00	7,735.00
K. Kolb	6.10	690.00	4,209.00
S. O'Donnell	3.50	1,075.00	3,762.50
L. Poretsky	1.30	410.00	533.00
TOTAL	20.00		\$16,239.50

DISBURSEMENTS:

	<u>AMOUNT</u>
Duplication	67.16
TOTAL:	<u>\$67.16</u>

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	3.40	2,318.00
B190	Other Contested Matters	16.60	13,921.50
TOTALS		20.00	\$16,239.50

PREVIOUS BILLS OUTSTANDING



Invoice Number: 547628
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<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
356647	07/16/20	62,817.18	60,748.68	2,068.50
540575	12/14/20	31,940.28	28,618.48	3,321.80
541327	01/19/21	51,933.19	44,680.99	7,252.20
542957	02/24/21	38,059.70	32,230.60	5,829.10
544217	03/25/21	4,063.00	3,290.40	772.60
545915	04/30/21	9,632.00	7,725.60	1,906.40
546768	05/25/21	19,600.60	0.00	19,600.60
Total Outstanding				\$40,751.20



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

July 19, 2021
Invoice Number: 549157
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through June 30, 2021	\$24,238.50
Expenses posted through June 30, 2021	200.00
TOTAL	<u>\$24,438.50</u>
Unpaid balance from previous invoice(s)	\$39,882.36
Total Due Now	\$64,320.86

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HERRICK

Invoice Number: 549157
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
06/01/21	K. Kolb	B190	Analyze proffer notes in connection with further demands and planning.	0.60
06/02/21	L. Poretsky	B160	Revise, redact, assemble exhibits, finalize and e-file HF Seventeenth Monthly Fee Statement April 1 2021 to April 30, 2021.	1.20
06/02/21	L. Poretsky	B160	Submit HF Seventeenth Monthly Fee Statement to Prime Clerk for service	0.40
06/11/21	K. Kolb	B190	Discuss next steps of investigation with C. Carty.	0.20
06/14/21	K. Kolb	B190	Draft proposed communication with investigation targets and related talking points.	0.20
06/16/21	C. Carty	B190	Analyze talking points for proffer calls.	0.50
06/18/21	C. Carty	B190	Confer with S. O'Donnell and K. Kolb regarding next steps to finalize investigation and analysis of same (0.6); review and comment on talking points for proffer calls (0.5).	1.10
06/18/21	K. Kolb	B190	Call regarding case strategy.	0.50
06/18/21	K. Kolb	B190	Email to opposing counsel regarding status update.	0.20
06/18/21	K. Kolb	B190	Draft strategy bullets for investigation update calls.	1.00
06/21/21	C. Carty	B190	Call with counsel to OCO Capital regarding investigation and prepare for same.	1.70
06/21/21	S. O'Donnell	B190	Confer with counsel for Omega; preparation for same; follow-up analysis re proffers; coordinate other confers.	1.20
06/21/21	K. Kolb	B190	Prepare for and attend update call with opposing counsel.	1.30
06/21/21	L. Poretsky	B160	Revise, redact, finalize HF Eighteenth Monthly Fee Statement and e-file	0.90
06/21/21	L. Poretsky	B160	Prepare Eighteenth Monthly Fee Statement for service, submit to Prime Clerk and discuss details of service	0.40
06/22/21	C. Carty	B190	Call with counsel to Barclays regarding investigation and prepare for same (1.1); call with counsel to Sculptor and prepare for same (0.6); analyze issues related to call with various counsel (1.2).	2.90
06/22/21	S. O'Donnell	B190	Coordinate meet and confers.	1.00
06/22/21	K. Kolb	B190	Email opposing counsel regarding further requests.	0.10
06/22/21	K. Kolb	B190	Prepare for and attend calls with counsel to Barclays and Sculptor.	1.60
06/22/21	K. Kolb	B190	Draft status update regarding investigation.	0.80



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Invoice Number: 549157
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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
06/22/21	K. Kolb	B190	Draft proposed agreement regarding investigation.	0.90
06/23/21	K. Kolb	B190	Draft agreement and affidavit.	0.70
06/24/21	S. O'Donnell	B190	Coordinate proffer confers and diligence re same.	0.50
06/25/21	C. Carty	B190	Analyze issues related to investigation updates (0.5); call with counsel to OCO Capital regarding follow up requests and prepare for same (0.7); review and revise email to UCC co-counsel regarding investigation status and updates (1.2).	2.40
06/25/21	S. O'Donnell	B190	Confer w/ team; review/revise committee update; conduct Omega followup call.	0.80
06/25/21	S. O'Donnell	B190	Confer re strategy and proffer; review/comment on Akin update email; coordinate affidavits and cooperation agreement.	1.00
06/25/21	K. Kolb	B190	Prepare for further conference with opposing counsel.	0.40
06/25/21	K. Kolb	B190	Draft update email to Committee regarding investigation.	0.50
06/25/21	K. Kolb	B190	Prepare for and attend update call with opposing counsel.	0.60
06/28/21	K. Kolb	B190	Revise update memo to UCC based on further negotiations with opposing counsel.	2.30
06/28/21	K. Kolb	B190	Draft affidavit to support investigation.	0.70
06/29/21	K. Kolb	B190	Draft affidavit for use in investigation.	0.90
06/29/21	K. Kolb	B190	Draft cooperation agreement.	1.70
06/30/21	K. Kolb	B190	Draft second affidavit for use in investigation.	0.60
TOTAL				\$24,238.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	8.60	850.00	7,310.00
K. Kolb	15.80	690.00	10,902.00
S. O'Donnell	4.50	1,075.00	4,837.50
L. Poretsky	2.90	410.00	1,189.00
TOTAL	31.80		\$24,238.50

DISBURSEMENTS:

AMOUNT



HERRICK

Invoice Number: 549157
Matter Number: 19609.0001
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	<u>AMOUNT</u>
E-Discovery Data Hosting	200.00
TOTAL:	<u>\$200.00</u>

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	2.90	1,189.00
B190	Other Contested Matters	28.90	23,049.50
TOTALS		31.80	\$24,238.50

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
356647	07/16/20	62,817.18	60,748.68	2,068.50
544217	03/25/21	4,063.00	4,062.80	0.20
545915	04/30/21	9,632.00	7,725.60	1,906.40
546768	05/25/21	19,600.60	0.00	19,600.60
547628	06/16/21	16,306.66	0.00	16,306.66
Total Outstanding				\$39,882.36



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

August 23, 2021
Invoice Number: 550688
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through July 31, 2021	\$31,094.50
Expenses posted through July 31, 2021	30,040.66
TOTAL	<u>\$61,135.16</u>
Unpaid balance from previous invoice(s)	\$19,255.80
Total Due Now	\$80,390.96

We would very much appreciate receiving payment by December 30th since our fiscal year ends on December 31st. Happy Holidays and thank you very much.

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HERRICK

Invoice Number: 550688
Matter Number: 19609.0001
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
07/01/21	C. Carty	B190	Revise draft memo to UCC regarding MTN investigation (1.2); review and analyze draft affidavits (0.9).	2.10
07/01/21	S. O'Donnell	B190	Review/comment on updated memo; confer w/ team re same; confer w/ Akin re same.	1.00
07/01/21	K. Kolb	B190	Further drafting of affidavit.	1.40
07/01/21	K. Kolb	B190	Revise and finalize memo to committee.	0.60
07/07/21	K. Kolb	B190	Analyze commentary on memo update to UCC.	0.10
07/08/21	C. Carty	B190	Revise cover email to UCC regarding memorandum and recommendations in MTN investigation.	0.80
07/08/21	S. O'Donnell	B190	Revise Committee memo.	0.50
07/08/21	K. Kolb	B190	Finalize memo to UCC regarding investigation.	0.90
07/08/21	L. Schepp	B190	Finalize documents cited in UCC Memo in preparation for attorney review.	0.80
07/13/21	C. Carty	B190	Prepare for UCC call re MTN investigation; review and revise draft outline for call.	2.30
07/13/21	K. Kolb	B190	Draft bullets on investigation status and claims based on review of memo and case law.	5.00
07/14/21	C. Carty	B190	Prepare for presentation to UCC regarding MTN investigation and participate in pre-call with Herrick and CMRA teams (0.7); participate in presentation to UCC regarding MTN investigation and prepare for same (0.7).	1.40
07/14/21	S. O'Donnell	B190	Pre-call w/ team and experts; prep for committee presentation; conduct same.	2.50
07/14/21	K. Kolb	B190	Prepare for presentation to UCC regarding investigation.	1.30
07/14/21	K. Kolb	B190	Attend prep call with experts regarding damages.	0.60
07/14/21	K. Kolb	B190	Revise committee bullets based on pre-call.	1.20
07/14/21	K. Kolb	B190	Attend call with UCC regarding investigation update.	0.70
07/14/21	K. Kolb	B190	Revise participant affidavits and circulate to CMRA for input.	0.90
07/16/21	K. Kolb	B190	Revise memo comparing allegations to other bankruptcy case.	0.90
07/19/21	S. O'Donnell	B160	Coordinate complaint drafting.	0.50
07/19/21	K. Kolb	B190	Revise affidavits and agreement and draft complaint.	4.90
07/19/21	L. Schepp	B190	Update ISDA documents collected for attorney review.	0.80
07/20/21	K. Kolb	B190	Revise affidavits and complaint and analyze auction rules and results.	2.40



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
07/20/21	K. Kolb	B190	Revise affidavit to incorporate expert feedback.	0.50
07/20/21	L. Schepp	B190	Create searches for documents relating to Jefferies in preparation for attorney review.	2.90
07/21/21	K. Kolb	B190	Revise further to incorporate additional feedback.	1.30
07/21/21	K. Kolb	B190	Call with expert regarding damages theories.	0.40
07/21/21	L. Schepp	B190	Compile various proffers into a chronology in preparation for attorney review.	2.30
07/23/21	K. Kolb	B190	Further analysis of proposed edits to declaration.	0.20
07/23/21	K. Kolb	B190	Analyze proposed edits to declaration.	0.30
07/24/21	K. Kolb	B190	Incorporate feedback into draft declaration.	1.00
07/26/21	K. Kolb	B190	Revise declarations in connection with investigation.	1.40
07/26/21	K. Kolb	B190	Draft proposed stipulation regarding claims.	0.30
TOTAL				\$30,974.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	6.60	850.00	5,610.00
K. Kolb	26.30	690.00	18,147.00
S. O'Donnell	4.50	1,075.00	4,837.50
L. Schepp	6.80	350.00	2,380.00
TOTAL	44.20		\$30,974.50

E-DISCOVERY & LITIGATION SUPPORT SERVICES

Data processing	120.00
TOTAL	\$120.00

TOTAL LEGAL SERVICES \$31,094.50

DISBURSEMENTS:

	<u>AMOUNT</u>
Duplication	222.40
E-Discovery Data Hosting	100.00



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Expert Witness Fees	29,605.00
Online Research	35.74
Pacer Charges	13.80
Postage & Shipping	63.72
TOTAL:	\$30,040.66

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	0.50	537.50
B190	Other Contested Matters	44.00	30,557.00
TOTALS		44.50	\$31,094.50

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
552265	09/21/21	30,434.00	24,367.20	6,066.80
553644	10/18/21	6,292.03	5,069.73	1,222.30
554956	11/08/21	8,842.70	0.00	8,842.70
556493	12/06/21	3,124.00	0.00	3,124.00
			Total Outstanding	\$19,255.80



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

September 21, 2021
Invoice Number: 552265
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through August 31, 2021	\$30,334.00
Expenses posted through August 31, 2021	100.00
TOTAL	<u>\$30,434.00</u>
Unpaid balance from previous invoice(s)	\$77,104.56
Total Due Now	\$107,538.56

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HERRICK

Invoice Number: 552265
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
08/02/21	C. Carty	B190	Review and provide comments to draft affidavits.	2.20
08/02/21	K. Kolb	B190	Incorporate feedback to draft affidavits.	2.00
08/02/21	G. Fromer	B190	Draft analysis of comparison of debtor's allegations to similar cases between Cyrus's actions with Marble Ridge's actions in the Neiman Marcus case.	1.60
08/03/21	C. Carty	B190	Review and comment on draft cooperation agreements.	1.10
08/03/21	K. Kolb	B190	Revise declarations based on feedback from C. Carty.	0.40
08/03/21	K. Kolb	B190	Revise draft agreement with investigation targets.	0.60
08/03/21	K. Kolb	B190	Draft complaint.	1.40
08/03/21	L. Poretsky	B160	Redact, assemble, finalize and e-file 19th fee statement and arrange the service via PrimeClick	1.40
08/03/21	L. Schepp	B190	Prepare network folders for attorney review in preparation for migration to new server location.	1.40
08/04/21	K. Kolb	B190	Draft adversary complaint.	4.70
08/04/21	K. Kolb	B190	Analyze and research complaints and briefing from similar prior cases.	1.10
08/05/21	K. Kolb	B190	Further drafting of complaint and analysis of supporting documents.	2.90
08/05/21	K. Kolb	B190	Revise and analyze chart summarizing auction bids.	1.00
08/05/21	L. Poretsky	B160	Follow up on request for information related to fourth fee application	0.20
08/05/21	L. Poretsky	B160	Draft fourth fee application	0.80
08/05/21	L. Poretsky	B160	Follow up with billing department on a status of billing related to Fourth Interim Fee Application	0.30
08/06/21	K. Kolb	B190	Analyze productions in connection with drafting adversary complaint.	3.60
08/06/21	L. Schepp	B190	Compile prior research into produced call logs for attorney review.	0.40
08/06/21	L. Schepp	B190	Compile discovery chronology in preparation for attorney review.	1.20
08/09/21	K. Kolb	B190	Further refining of complaint.	0.60
08/10/21	K. Kolb	B190	Revise portions of complaint regarding holdings.	0.90
08/10/21	K. Kolb	B190	Revise summary of allegations to compare with recent committee cases.	0.20
08/10/21	L. Poretsky	B160	Analyze documents filed on a docket pertinent to the fifth fee application	1.50



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Matter Number: 19609.0001
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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
08/10/21	L. Poretsky	B160	Follow up with billing department re missing information and discuss discrepancies	0.60
08/10/21	L. Poretsky	B160	Continue to draft fifth fee application	2.40
08/11/21	C. Carty	B160	Review and revise interim fee application.	1.30
08/12/21	L. Poretsky	B160	Conference with billing department to discuss discrepancies in billing summaries and invoices	0.40
08/12/21	L. Poretsky	B160	Draft fifth fee application and revise per comments;	2.90
08/13/21	C. Carty	B160	Revise and finalize draft of interim fee application; correspondence with Akin re same.	2.10
08/13/21	L. Poretsky	B160	Revise and finalize fifth fee application and circulate for review	0.70
08/16/21	C. Carty	B160	Finalize interim fee app for filing.	0.20
08/16/21	L. Poretsky	B160	Revise and finalize Fifth Fee Application	0.30
08/16/21	L. Poretsky	B160	Prepare for filing and e-file Fifth Fee Application	0.50
08/16/21	L. Poretsky	B160	Submit filed Fifth Fee Application to Prime Clerk for the service.	0.30
08/17/21	C. Carty	B190	Analyze privilege issues concerning declarations.	0.30
08/17/21	S. O'Donnell	B160	Review/revise affidavits; confer w/ team re same.	1.00
08/17/21	K. Kolb	B190	Revise declarations and agreements and discuss with C. Carty.	0.70
08/17/21	G. Fromer	B190	Discuss proffers with K. Kolb.	0.10
08/17/21	G. Fromer	B190	Review notes and emails from conversations with Stroock, Kramer Levin, and Quinn Emanuel.	0.60
08/17/21	L. Schepp	B190	Update numerous proffer summary memorandums in preparation for attorney review.	0.70
08/18/21	C. Carty	B190	Analyze privilege issues concerning declarations.	0.30
08/18/21	K. Kolb	B190	Analyze research into work product issue.	0.60
08/18/21	K. Kolb	B190	Email investigation targets with case updates.	0.50
08/19/21	S. O'Donnell	B160	Review/comment/finalize proffer affs.	0.80
			TOTAL	\$30,334.00



HERRICK

Invoice Number: 552265
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	7.50	850.00	6,375.00
G. Fromer	2.30	460.00	1,058.00
K. Kolb	21.20	690.00	14,628.00
S. O'Donnell	1.80	1,075.00	1,935.00
L. Poretsky	12.30	410.00	5,043.00
L. Schepp	3.70	350.00	1,295.00
TOTAL	48.80		\$30,334.00

DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
TOTAL:	\$100.00

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	17.70	10,038.00
B190	Other Contested Matters	31.10	20,296.00
TOTALS		48.80	\$30,334.00

PREVIOUS BILLS OUTSTANDING



Invoice Number: 552265
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<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
356647	07/16/20	62,817.18	60,748.68	2,068.50
544217	03/25/21	4,063.00	4,062.80	0.20
545915	04/30/21	9,632.00	7,725.60	1,906.40
546768	05/25/21	19,600.60	15,701.90	3,898.70
547628	06/16/21	16,306.66	13,058.76	3,247.90
549157	07/19/21	24,438.50	19,590.80	4,847.70
550688	08/23/21	61,135.16	0.00	61,135.16
Total Outstanding				\$77,104.56



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

October 18, 2021
Invoice Number: 553644
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through September 30, 2021	\$6,111.50
Expenses posted through September 30, 2021	180.53
TOTAL	<u>\$6,292.03</u>
Unpaid balance from previous invoice(s)	\$24,252.40
Total Due Now	\$30,544.43

We would very much appreciate receiving payment by December 30th since our fiscal year ends on December 31st. Happy Holidays and thank you very much.

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HERRICK

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Matter Number: 19609.0001
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
09/01/21	L. Poretsky	B160	Revise, redact, assemble and e-file HF Twentieth Monthly Fee Statement	1.00
09/01/21	L. Poretsky	B160	Submit Twentieth Monthly Fee Statement to Prime Clerk for service and chambers copy	0.40
09/21/21	K. Kolb	B190	Review email from counsel to CDS participant.	0.10
09/23/21	S. O'Donnell	B190	Case admin; confer with team.	0.30
09/27/21	C. Carty	B160	Appear at omnibus hearing for purposes of fee applications and prepare for same.	1.50
09/28/21	C. Carty	B160	Analyze issues related to fee applications and respond to M3 questions re same.	0.30
09/28/21	K. Kolb	B190	Discuss investigation status and strategy with C. Carty.	0.20
09/29/21	C. Carty	B190	Review and analyze draft complaint and attention to strategy considerations (1.6); call with S. O'Donnell and K. Kolb re next steps (0.3).	1.90
09/29/21	K. Kolb	B190	Discuss strategy with S. O'Donnell and C. Carty (.2); email opposing counsel regarding response status (.2); call with opposing counsel regarding response status (.2).	0.60
09/29/21	K. Kolb	B190	Revise complaint.	2.10
TOTAL				\$6,111.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	3.70	850.00	3,145.00
K. Kolb	3.00	690.00	2,070.00
S. O'Donnell	0.30	1,075.00	322.50
L. Poretsky	1.40	410.00	574.00
TOTAL	8.40		\$6,111.50

DISBURSEMENTS:

AMOUNT



HERRICK

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Matter Number: 19609.0001
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E-Discovery Data Hosting	100.00
Online Research	80.53
TOTAL:	\$180.53

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	3.20	2,104.00
B190	Other Contested Matters	5.20	4,007.50
TOTALS		8.40	\$6,111.50

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
550688	08/23/21	61,135.16	54,916.26	6,218.90
552265	09/21/21	30,434.00	24,367.20	6,066.80
554956	11/08/21	8,842.70	0.00	8,842.70
556493	12/06/21	3,124.00	0.00	3,124.00
			Total Outstanding	\$24,252.40



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

November 8, 2021
Invoice Number: 554956
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through October 31, 2021	\$8,735.00
Expenses posted through October 31, 2021	107.70
TOTAL	<u>\$8,842.70</u>
Unpaid balance from previous invoice(s)	\$16,632.00
Total Due Now	\$25,474.70

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Invoice Number: 554956
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/04/21	L. Poretsky	B160	Revise, assemble, redact and finalize Twenty-First Monthly Fee Statement	0.90
10/04/21	L. Poretsky	B160	Prepare Twenty-First Monthly Fee Statement for filing and e-file	0.40
10/04/21	L. Poretsky	B160	Prepare Twenty-First Monthly Fee Statement for service and submit to Prime Clerk.	0.30
10/06/21	K. Kolb	B190	Revise agreement with CDS Participants.	0.20
10/06/21	G. Fromer	B190	Draft tolling agreements.	2.30
10/06/21	G. Fromer	B190	Discuss tolling agreement with H. Zimmer.	0.10
10/06/21	G. Fromer	B190	Email K. Kolb regarding the tolling agreement.	0.10
10/06/21	L. Schepp	B190	Compile document production history for attorney review.	0.90
10/16/21	K. Kolb	B190	Revise tolling agreement.	0.20
10/16/21	K. Kolb	B190	Prepare for call with counsel for investigation target.	0.50
10/17/21	K. Kolb	B190	Prepare for call with counsel for investigation target.	0.90
10/20/21	C. Carty	B190	Analyze issues related to affidavit and confer with K. Kolb re same.	0.40
10/20/21	K. Kolb	B190	Revise summary of information to provide to opposing counsel.	0.30
10/20/21	L. Schepp	B190	Compile documents cited in declaration in preparation for attorney review.	2.20
10/21/21	K. Kolb	B190	Call with opposing counsel regarding investigation.	0.40
10/26/21	L. Poretsky	B160	Review, redact, revise, finalize and e-file 22nd monthly fee statement for September 2021	1.00
10/26/21	L. Poretsky	B160	Prepare 22nd fee statement for service and submit to Prime clerk.	0.40
10/28/21	C. Carty	B190	Review and revise draft complaint.	1.40
10/29/21	C. Carty	B190	Review and revise draft complaint.	1.10
TOTAL				\$7,655.00



HERRICK

Invoice Number: 554956
Matter Number: 19609.0001
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	2.90	850.00	2,465.00
G. Fromer	2.50	460.00	1,150.00
K. Kolb	2.50	690.00	1,725.00
L. Poretsky	3.00	410.00	1,230.00
L. Schepp	3.10	350.00	1,085.00
TOTAL	14.00		\$7,655.00

E-DISCOVERY & LITIGATION SUPPORT SERVICES

Project Management	1,080.00
TOTAL	\$1,080.00

TOTAL LEGAL SERVICES	\$8,735.00
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DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
Pacer Charges	7.70
TOTAL:	\$107.70

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	3.00	1,230.00
B190	Other Contested Matters	13.70	7,505.00
TOTALS		16.70	\$8,735.00

PREVIOUS BILLS OUTSTANDING



Invoice Number: 554956
Matter Number: 19609.0001
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<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
550688	08/23/21	61,135.16	54,916.26	6,218.90
552265	09/21/21	30,434.00	24,367.20	6,066.80
553644	10/18/21	6,292.03	5,069.73	1,222.30
556493	12/06/21	3,124.00	0.00	3,124.00
Total Outstanding				\$16,632.00



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

December 6, 2021
Invoice Number: 556493
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through November 30, 2021	\$3,024.00
Expenses posted through November 30, 2021	100.00
TOTAL	<u>\$3,124.00</u>
Unpaid balance from previous invoice(s)	\$22,350.70
Total Due Now	\$25,474.70

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Invoice Number: 556493
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/15/21	C. Carty	B190	Analyze issues related to Rule 2004 investigation and procedural issues for litigation.	2.20
11/17/21	L. Poretsky	B160	Review, revise, redact, assemble and e-file 23rd Monthly Fee Statement	1.00
11/17/21	L. Poretsky	B160	Submit filed 23rd Monthly Fee Statement to Prime Clerk for the service and discuss details.	0.30
11/26/21	K. Kolb	B190	Draft investigation update to debtors counsel.	0.30
11/28/21	K. Kolb	B190	Research potential stipulation related to investigation claims.	0.30
11/28/21	K. Kolb	B190	Revise email to debtors counsel regarding investigation.	0.30
TOTAL				\$3,024.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	2.20	850.00	1,870.00
K. Kolb	0.90	690.00	621.00
L. Poretsky	1.30	410.00	533.00
TOTAL	4.40		\$3,024.00

DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
TOTAL:	\$100.00

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.30	533.00
B190	Other Contested Matters	3.10	2,491.00



Invoice Number: 556493
Matter Number: 19609.0001
Page: 3

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
TOTALS		4.40	\$3,024.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
550688	08/23/21	61,135.16	54,916.26	6,218.90
552265	09/21/21	30,434.00	24,367.20	6,066.80
553644	10/18/21	6,292.03	5,069.73	1,222.30
554956	11/08/21	8,842.70	0.00	8,842.70
			Total Outstanding	\$22,350.70



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

January 31, 2022
Invoice Number: 559069
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through December 31, 2021	\$18,236.50
Expenses posted through December 31, 2021	106.84
TOTAL	<u>\$18,343.34</u>
Unpaid balance from previous invoice(s)	\$15,859.80
Total Due Now	\$34,203.14

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Invoice Number: 559069
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
12/02/21	C. Carty	B190	Correspondence related to MTN investigation/claims.	0.20
12/02/21	C. Carty	B190	Review and revise draft complaint related to MTN claims.	1.80
12/02/21	K. Kolb	B190	Research STN and Commodore issues.	0.20
12/03/21	C. Carty	B190	Review and revise draft complaint related to MTN claims.	2.80
12/03/21	K. Kolb	B190	Draft stipulation and research standing issue.	1.80
12/03/21	K. Kolb	B190	Email opposing counsel regarding tolling agreement.	0.40
12/03/21	K. Kolb	B190	Revise adversary complaint.	0.80
12/03/21	K. Kolb	B190	Analyze case law related to standing issue.	0.50
12/06/21	K. Kolb	B190	Revise complaint and stipulation.	2.90
12/06/21	L. Poretsky	B160	Conference with Chris Carty re sixth fee application and request details from billing department	0.50
12/07/21	L. Poretsky	B160	Analyze summary reports received from billing department	0.40
12/07/21	L. Poretsky	B160	Draft sixth fee application	5.00
12/08/21	S. O'Donnell	B110	Coordinate case.	0.50
12/09/21	L. Poretsky	B160	Revise, finalize and proof read HF sixth fee application and circulate for review	2.00
12/10/21	C. Carty	B160	Review and revise draft interim fee application to send to client.	1.10
12/10/21	C. Carty	B190	Analyze potential claims and next steps.	1.20
12/13/21	C. Carty	B190	Revise draft complaint regarding MTN investigation.	1.50
12/13/21	K. Kolb	B190	Further revisions to adversary complaint.	1.10
12/14/21	C. Carty	B160	Revise and finalize interim fee application.	0.20
12/14/21	L. Poretsky	B160	Prepare sixth fee application for filing and e-file	0.60
12/14/21	L. Poretsky	B160	Submit filed sixth fee application to PrimeClerk for service	0.40
12/15/21	L. Poretsky	B160	Revise, redact, assemble and e-file the 24th monthly fee statement.	0.80
12/15/21	L. Poretsky	B160	Prepare for service 24th monthly fee statement and submit to PrimeClerk for service	0.40
12/16/21	C. Carty	B190	Call with Debtors' counsel regarding MTN investigation (0.2); review and revise complaint (0.7).	0.90

TOTAL \$18,236.50



Invoice Number: 559069
Matter Number: 19609.0001
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	9.70	850.00	8,245.00
K. Kolb	7.70	690.00	5,313.00
S. O'Donnell	0.50	1,075.00	537.50
L. Poretsky	10.10	410.00	4,141.00
TOTAL	28.00		\$18,236.50

DISBURSEMENTS:

	<u>AMOUNT</u>
Duplication	6.84
E-Discovery Data Hosting	100.00
TOTAL:	\$106.84

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B110	Case Administration	0.50	537.50
B160	Fee/Employment Applications	11.40	5,246.00
B190	Other Contested Matters	16.10	12,453.00
TOTALS		28.00	\$18,236.50

PREVIOUS BILLS OUTSTANDING



HERRICK

Invoice Number: 559069
Matter Number: 19609.0001
Page: 4

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
550688	08/23/21	61,135.16	54,916.26	6,218.90
552265	09/21/21	30,434.00	24,367.20	6,066.80
553644	10/18/21	6,292.03	5,069.73	1,222.30
554956	11/08/21	8,842.70	7,095.70	1,747.00
556493	12/06/21	3,124.00	2,519.20	604.80
Total Outstanding				\$15,859.80



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

February 17, 2022
Invoice Number: 559894
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through January 31, 2022	\$13,164.50
Expenses posted through January 31, 2022	189.97
TOTAL	<u>\$13,354.47</u>
Unpaid balance from previous invoice(s)	\$34,203.14
Total Due Now	\$47,557.61

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Invoice Number: 559894
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
01/04/22	C. Carty	B190	Analyze issues related to standing.	1.20
01/05/22	C. Carty	B190	Call with Debtors' counsel regarding standing issues (0.3); analyze issues related to standing (1.1).	1.40
01/07/22	C. Carty	B190	Analyze research related to UCC standing.	2.30
01/10/22	C. Carty	B190	Call with Weil regarding potential MTN claim and standing issues (0.3); analyze issues related to same (0.5).	0.80
01/11/22	C. Carty	B190	Revise draft complaint.	1.50
01/14/22	K. Kolb	B190	Discuss negotiation status with C. Carty.	0.30
01/20/22	C. Carty	B160	Attend portion of omnibus hearing re case status update and fee applications.	1.00
01/20/22	C. Carty	B190	Analyze issues related to complaint and standing.	1.80
01/26/22	C. Carty	B190	Analyze issues related to complaint and standing.	2.30
01/28/22	C. Carty	B190	Analyze issues related to complaint and standing.	1.70
TOTAL				\$13,164.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	14.00	925.00	12,950.00
K. Kolb	0.30	715.00	214.50
TOTAL	14.30		\$13,164.50

DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
Online Research	61.87
Pacer Charges	28.10
TOTAL:	\$189.97



Invoice Number: 559894
Matter Number: 19609.0001
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TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.00	925.00
B190	Other Contested Matters	13.30	12,239.50
TOTALS		14.30	\$13,164.50

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
550688	08/23/21	61,135.16	54,916.26	6,218.90
552265	09/21/21	30,434.00	24,367.20	6,066.80
553644	10/18/21	6,292.03	5,069.73	1,222.30
554956	11/08/21	8,842.70	7,095.70	1,747.00
556493	12/06/21	3,124.00	2,519.20	604.80
559069	01/31/22	18,343.34	0.00	18,343.34
Total Outstanding				\$34,203.14



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

April 6, 2022
Invoice Number: 562340
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through February 28, 2022	\$9,995.50
Expenses posted through February 28, 2022	112.88
TOTAL	<u>\$10,108.38</u>
Unpaid balance from previous invoice(s)	\$22,140.00
Total Due Now	\$32,248.38

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Invoice Number: 562340
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
02/03/22	C. Carty	B190	Analyze standing issues and draft portion of complaint.	1.60
02/08/22	C. Carty	B190	Analyze standing issues and draft portion of complaint.	1.60
02/10/22	C. Carty	B190	Analyze issues related to standing and case strategy.	1.50
02/10/22	K. Kolb	B190	Discuss standing negotiations with C. Carty.	0.40
02/10/22	S. O'Donnell	B190	Strategy and analysis w/ team.	0.50
02/11/22	C. Carty	B190	Analyze case strategy.	0.80
02/15/22	L. Poretsky	B160	Revise, redact, assemble, finalize and e-file HF Twenty-Fifth Fee Statement December 1, 2021 through December 31, 2021	1.00
02/15/22	L. Poretsky	B160	Submit request to PrimeClerk for the service of the HF Twenty-Fifth Fee Statement December 1, 2021 through December 31, 2021	0.40
02/22/22	C. Carty	B190	Analyze standing issues and draft portion of complaint.	1.50
02/28/22	C. Carty	B190	Analyze standing issues and draft portion of complaint.	2.20
TOTAL				\$9,995.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	9.20	925.00	8,510.00
K. Kolb	0.40	715.00	286.00
S. O'Donnell	0.50	1,125.00	562.50
L. Poretsky	1.40	455.00	637.00
TOTAL	11.50		\$9,995.50

DISBURSEMENTS:

	<u>AMOUNT</u>
Document Processing	12.88
E-Discovery Data Hosting	100.00
TOTAL:	\$112.88



HERRICK

Invoice Number: 562340
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TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.40	637.00
B190	Other Contested Matters	10.10	9,358.50
TOTALS		11.50	\$9,995.50

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
550688	08/23/21	61,135.16	54,916.26	6,218.90
552265	09/21/21	30,434.00	24,367.20	6,066.80
553644	10/18/21	6,292.03	5,069.73	1,222.30
554956	11/08/21	8,842.70	7,095.70	1,747.00
556493	12/06/21	3,124.00	2,519.20	604.80
559069	01/31/22	18,343.34	14,696.04	3,647.30
559894	02/17/22	13,354.47	10,721.57	2,632.90
Total Outstanding				\$22,140.00



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

May 2, 2022
Invoice Number: 563646
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through March 31, 2022	\$6,634.00
Expenses posted through March 31, 2022	100.00
TOTAL	<u>\$6,734.00</u>
Unpaid balance from previous invoice(s)	\$32,248.38
Total Due Now	\$38,982.38

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Invoice Number: 563646
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
03/01/22	L. Poretsky	B160	Revise, redact, finalize and e-file 26th monthly fee statement.	1.00
03/01/22	L. Poretsky	B160	Prepare and submit request for service of 26th monthly fee statement to PrimeClerk.	0.40
03/21/22	C. Carty	B190	Analyze issues related to complaint and negotiation for standing.	0.80
03/21/22	K. Kolb	B190	Revise adversary complaint.	3.10
03/22/22	K. Kolb	B190	Revise adversary complaint.	2.20
03/22/22	K. Kolb	B190	Revise email to debtors' counsel.	0.20
03/22/22	K. Kolb	B190	Revise standing stipulation.	0.30
03/25/22	C. Carty	B190	Correspondence with Debtors' counsel re MTN matter and potential claims.	1.20
TOTAL				\$6,634.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	2.00	925.00	1,850.00
K. Kolb	5.80	715.00	4,147.00
L. Poretsky	1.40	455.00	637.00
TOTAL	9.20		\$6,634.00

DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
TOTAL:	\$100.00

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.40	637.00



Invoice Number: 563646
Matter Number: 19609.0001
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TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B190	Other Contested Matters	7.80	5,997.00
TOTALS		9.20	\$6,634.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
550688	08/23/21	61,135.16	54,916.26	6,218.90
552265	09/21/21	30,434.00	24,367.20	6,066.80
553644	10/18/21	6,292.03	5,069.73	1,222.30
554956	11/08/21	8,842.70	7,095.70	1,747.00
556493	12/06/21	3,124.00	2,519.20	604.80
559069	01/31/22	18,343.34	14,696.04	3,647.30
559894	02/17/22	13,354.47	10,721.57	2,632.90
562340	04/06/22	10,108.38	0.00	10,108.38
Total Outstanding				\$32,248.38



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

May 31, 2022
Invoice Number: 565030
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through April 30, 2022	\$3,565.00
Expenses posted through April 30, 2022	107.10
TOTAL	<u>\$3,672.10</u>
Unpaid balance from previous invoice(s)	\$38,982.38
Total Due Now	\$42,654.48

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Invoice Number: 565030
Matter Number: 19609.0001
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
04/06/22	K. Kolb	B190	Analyze mediation order.	0.20
04/12/22	C. Carty	B160	Review and revise draft interim fee application.	1.20
04/12/22	L. Poretsky	B160	Request and analyze expense detail for 27th Monthly Fee Statement.	0.30
04/12/22	L. Poretsky	B160	Revise, redact, assemble, finalize and e-file 27th Monthly Fee Statement.	1.00
04/12/22	L. Poretsky	B160	Submit Request for service of filed 27th Month Fee Statement to PrimeClerk.	0.30
04/13/22	L. Poretsky	B160	Review and revise draft of the seventh fee application, run redline and submit to Chris Carty for review.	1.00
04/14/22	C. Carty	B160	Finalize interim fee application for filing.	0.30
04/14/22	L. Poretsky	B160	Submit request for service on Seventh Interim Fee Application of Herrick, Feinstein LLP to Primeclerk and discuss details.	0.40
04/14/22	L. Poretsky	B160	Revise, finalize and e-file Seventh Interim Fee Application of Herrick, Feinstein LLP.	1.00
04/21/22	K. Kolb	B190	Revise case budget.	0.30
TOTAL				\$3,565.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	1.50	925.00	1,387.50
K. Kolb	0.50	715.00	357.50
L. Poretsky	4.00	455.00	1,820.00
TOTAL	6.00		\$3,565.00

DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
Pacer Charges	7.10
TOTAL:	\$107.10



HERRICK

Invoice Number: 565030
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TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	5.50	3,207.50
B190	Other Contested Matters	0.50	357.50
TOTALS		6.00	\$3,565.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
550688	08/23/21	61,135.16	54,916.26	6,218.90
552265	09/21/21	30,434.00	24,367.20	6,066.80
553644	10/18/21	6,292.03	5,069.73	1,222.30
554956	11/08/21	8,842.70	7,095.70	1,747.00
556493	12/06/21	3,124.00	2,519.20	604.80
559069	01/31/22	18,343.34	14,696.04	3,647.30
559894	02/17/22	13,354.47	10,721.57	2,632.90
562340	04/06/22	10,108.38	0.00	10,108.38
563646	05/02/22	6,734.00	0.00	6,734.00
Total Outstanding				\$38,982.38



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

July 5, 2022
Invoice Number: 566702
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through May 31, 2022	\$5,731.50
Expenses posted through May 31, 2022	100.00
TOTAL	<u>\$5,831.50</u>
Unpaid balance from previous invoice(s)	\$13,883.00
Total Due Now	\$19,714.50

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Invoice Number: 566702
Matter Number: 19609.0001
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
05/04/22	K. Kolb	B190	Prepare case analysis and budget.	0.50
05/12/22	C. Carty	B190	Respond to email from Debtors' counsel regarding potential MTN claim (0.5); analyze issues related to potential MTN claim (1.5); call with UCC co-counsel re mediation impact on MTN claim (0.4).	2.40
05/12/22	K. Kolb	B190	Analyze inquiry from debtors' counsel regarding mediation.	0.20
05/12/22	S. O'Donnell	B160	Confer re mediation; review/comment on Weil response.	0.30
05/13/22	L. Poretsky	B160	Revise, redact, finalize and e-file 28th monthly fee statement	0.80
05/13/22	L. Poretsky	B160	Prepare and submit request for service of 28th monthly fee statement to PrimeClerk	0.40
05/16/22	C. Carty	B190	Draft update regarding MTN investigation.	1.20
05/18/22	C. Carty	B190	Draft update regarding MTN investigation.	1.10
TOTAL				\$5,731.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	4.70	925.00	4,347.50
K. Kolb	0.70	715.00	500.50
S. O'Donnell	0.30	1,125.00	337.50
L. Poretsky	1.20	455.00	546.00
TOTAL	6.90		\$5,731.50

DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
TOTAL:	\$100.00



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Matter Number: 19609.0001
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TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.50	883.50
B190	Other Contested Matters	5.40	4,848.00
TOTALS		6.90	\$5,731.50

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
556493	12/06/21	3,124.00	2,519.20	604.80
559069	01/31/22	18,343.34	14,696.04	3,647.30
559894	02/17/22	13,354.47	10,721.57	2,632.90
562340	04/06/22	10,108.38	8,109.28	1,999.10
563646	05/02/22	6,734.00	5,407.20	1,326.80
565030	05/31/22	3,672.10	0.00	3,672.10
Total Outstanding				\$13,883.00



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

August 1, 2022
Invoice Number: 568157
Matter Number: 19609.0001

Re: **Sears Bankruptcy**

Fees for legal services rendered through June 30, 2022	\$13,425.00
Expenses posted through June 30, 2022	100.00
TOTAL	<u>\$13,525.00</u>
Unpaid balance from previous invoice(s)	\$19,714.50
Total Due Now	\$33,239.50

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Invoice Number: 568157
Matter Number: 19609.0001
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
06/03/22	K. Kolb	B190	Respond to inquiry regarding mediation analysis.	0.30
06/08/22	C. Carty	B190	Prepare for meeting with mediator related to Cyrus.	0.50
06/08/22	K. Kolb	B190	Call with expert regarding MTN case status.	0.20
06/08/22	K. Kolb	B190	Respond to inquiry regarding mediation.	0.10
06/10/22	C. Carty	B190	Prepare for meeting with mediator regarding Cyrus (0.8); participate in meeting with mediator regarding Cyrus (1.1).	1.90
06/10/22	S. O'Donnell	B190	Prepare and participate in call with J. Peck; follow up calls/emails re: same.	1.50
06/14/22	C. Carty	B190	Draft update regarding MTN investigation and discussions with Debtors and mediator.	2.50
06/14/22	K. Kolb	B190	Revise committee update regarding MTN investigation.	0.60
06/14/22	S. O'Donnell	B190	Confer with Sears re mediation update to UCC; review/comment on same.	0.30
06/15/22	S. O'Donnell	B190	Confer with client and mediator.	0.20
06/20/22	C. Carty	B190	Analyze issues regarding mediation of claims against Cyrus and correspondence with UCC co-counsel.	2.50
06/20/22	K. Kolb	B190	Analyze and revise update to committee and mediator.	2.80
06/20/22	S. O'Donnell	B190	Confer re mediation; confer with J. Peck re same: review/revise update to UCC.	0.70
06/21/22	L. Poretsky	B160	Revise, redact, assemble, finalize and e-file Twenty-Ninth Monthly Fee Statement	0.90
06/21/22	L. Poretsky	B160	Prepare for service filed Twenty-Ninth Monthly Fee Statement and submit to PrimeClerk for service and circulate to the team	0.60
TOTAL				\$13,425.00



HERRICK

Invoice Number: 568157
Matter Number: 19609.0001
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	7.40	925.00	6,845.00
K. Kolb	4.00	715.00	2,860.00
S. O'Donnell	2.70	1,125.00	3,037.50
L. Poretsky	1.50	455.00	682.50
TOTAL	15.60		\$13,425.00

DISBURSEMENTS:

	<u>AMOUNT</u>
E-Discovery Data Hosting	100.00
TOTAL:	\$100.00

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	1.50	682.50
B190	Other Contested Matters	14.10	12,742.50
TOTALS		15.60	\$13,425.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
556493	12/06/21	3,124.00	2,519.20	604.80
559069	01/31/22	18,343.34	14,696.04	3,647.30
559894	02/17/22	13,354.47	10,721.57	2,632.90
562340	04/06/22	10,108.38	8,109.28	1,999.10
563646	05/02/22	6,734.00	5,407.20	1,326.80
565030	05/31/22	3,672.10	0.00	3,672.10
566702	07/05/22	5,831.50	0.00	5,831.50
Total Outstanding				\$19,714.50



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

March 13, 2020
Bill Number: 352222
File Number: 19609-0002

Re: Prepetition Transfer Litigation

Fees for legal services rendered through February 29, 2020	\$334,508.00
Expenses posted through February 29, 2020	7,554.79
TOTAL	\$342,062.79

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Re: **Prepetition Transfer Litigation**

Bill Number: 352222
File Number: 19609-0002
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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
11/04/19	C. Carty	B190	Review and analyze draft proposed adversary complaint and related presentation; analyze claims against certain defendants.	2.50
11/05/19	C. Carty	B190	Review and analyze draft proposed adversary complaint and related presentation; analyze claims against certain defendants.	3.10
11/06/19	C. Carty	B190	Review and analyze draft proposed adversary complaint and related presentation; analyze claims against certain defendants.	1.30
11/07/19	C. Carty	B190	Review and analyze materials related to proposed adversary complaint to analyze claims against certain defendants.	3.20
11/07/19	S. Smith	B190	Follow up review of draft complaint against Cyrus and others.	1.00
11/08/19	C. Carty	B190	Review and analyze materials related to proposed adversary complaint to analyze claims against certain defendants.	2.30
11/08/19	C. Carty	B190	Review and analyze materials related to proposed adversary complaint to analyze claims against certain defendants.	1.90



Re: **Prepetition Transfer Litigation**

Bill Number: 352222
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11/11/19	C. Carty	B190	Review and analyze draft first amended complaint and supporting materials to analyze viability of certain claims against certain defendants.	3.20
11/11/19	C. Carty	B190	Call with co-counsel at Akin regarding draft first amended complaint and supporting documents.	.50
11/11/19	S. O'Donnell	B190	Claims/complaint analysis.	1.00
11/12/19	C. Carty	B190	Review and analyze draft first amended complaint and supporting materials to analyze viability of certain claims against certain defendants.	4.30
11/13/19	C. Carty	B190	Review and analyze draft first amended complaint and supporting materials to analyze viability of certain claims against certain defendants.	2.50
11/13/19	S. Smith	B190	Follow up review of amended complaint against Cyrus and related defendants.	.70
11/14/19	C. Carty	B190	Review and analyze draft first amended complaint and supporting materials to analyze viability of certain claims against certain defendants.	3.20
11/14/19	H. Zimmer	B190	Confer with Chris Carty concerning research for complaint	.10



Re: **Prepetition Transfer Litigation**

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11/14/19	H. Zimmer	B190	Confer with Christopher Carty concerning action and status of same	.40
11/14/19	H. Zimmer	B190	Conduct research concerning viability and pleading requirements of unjust enrichment and fraudulent conveyance claims	1.30
11/14/19	S. O'Donnell	B190	Claims analysis	2.00
11/15/19	C. Carty	B190	Provide comments to certain claims in draft adversary complaint.	2.10
11/15/19	C. Carty	B190	Review and analyze draft first amended complaint and supporting materials to analyze viability of certain claims against certain defendants.	1.50
11/15/19	H. Zimmer	B190	Analyze proposed first amended adversary complaint, presentation to the litigation designees, and other documents concerning factual details	2.50
11/15/19	S. O'Donnell	B190	Review amended cplt	1.00
11/15/19	S. O'Donnell	B190	Confer w/ C. Carty re: amended cplt	.50
11/15/19	S. O'Donnell	B190	Claims analysis	1.00
11/16/19	C. Carty	B190	Call with S. O'Donnell re potential additional claims.	.30
11/16/19	C. Carty	B190	Review and analyze draft first amended complaint and supporting materials to analyze viability of certain claims against certain potential defendants.	1.90



Re: **Prepetition Transfer Litigation**

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11/17/19	C. Carty	B190	Call with Akin team regarding potential additional claims and investigation of such claims.	.40
11/17/19	C. Carty	B190	Analyze potential additional claims and investigation of such claims.	1.10
11/17/19	C. Carty	B190	Call with S. O'Donnell regarding potential additional claims and investigation of such claims.	.20
11/17/19	S. O'Donnell	B190	Prep and participate in Akin call	.50
11/17/19	S. O'Donnell	B190	Claims analysis	.50
11/18/19	C. Carty	B190	Confer with team members regarding Sears matter and analyze estate claims based on draft complaint and related documents.	3.50
11/18/19	C. Carty	B190	Research potential causes of action in connection with Sears prepetition transfer litigation.	2.40
11/18/19	J. D'Angelo	B190	E-mail with S. O'Donnell and call with C. Carty re: potential claims; initial research re: same; review draft First Amended Complaint; review prior research on breach of fiduciary duty and aiding and abetting breach of fiduciary against counsel.	6.60
11/18/19	S. O'Donnell	B190	Claims analysis; case admin.	1.50
11/19/19	C. Carty	B190	Analyze issues related to potential additional claims in connection with prepetition transfer litigation.	2.60



Re: **Prepetition Transfer Litigation**

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11/19/19	H. Zimmer	B190	Analyze complaint, presentations, and related documents from Akin on same	2.50
11/19/19	J. D'Angelo	B190	Review additional background materials and materials re: pursuing claims	2.80
11/20/19	C. Carty	B190	Analyze issues related to discovery of certain third parties in connection with prepetition transaction litigation.	.80
11/20/19	H. Zimmer	B190	Review discovery documents and other documents from Akin	3.10
11/20/19	J. D'Angelo	B190	Review revised draft complaint and e-mail re: same; review of additional background materials, etc.	2.70
11/20/19	S. Smith	B190	Follow up review of further revised draft complaint.	1.30
11/21/19	C. Carty	B190	Analyze issues related to third party discovery.	1.30
11/21/19	S. Smith	B190	Follow up review of revised complaint.	.80
11/22/19	C. Carty	B190	Call with D. Chapman regarding discovery related to prepetition transfer litigation.	.70
11/22/19	C. Carty	B190	Review draft complaint and analyze issues related to discovery.	2.50
11/22/19	C. Carty	B190	Review and analyze documents produced during Rule 2004 investigation.	1.50



Re: **Prepetition Transfer Litigation**

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11/25/19	C. Carty	B190	Review and analyze draft third party discovery requests and analyze additional requests.	1.20
11/25/19	C. Carty	B190	Call with J. D'Angelo and H. Zimmer regarding Sears discovery.	.30
11/25/19	H. Zimmer	B190	Confer with Chris Carty concerning discovery , including call with Jason D'Angelo	.40
11/25/19	H. Zimmer	B190	Analyze complaint and revise discovery documents to Cyrus Defendants concerning same and confer with Chris Carty on same	.70
11/25/19	J. D'Angelo	B190	Email with C. Carty re: discovery, etc.; call with team re: same.	.40
11/25/19	S. O'Donnell	B190	Confer w/ team re: discovery	.20
11/25/19	S. O'Donnell	B190	Prep for filing and discovery	.30
11/25/19	S. Smith	B190	Review of further draft complaint.	.70
11/26/19	C. Carty	B190	Review and analyze draft third party discovery requests and analyze additional requests.	2.20
11/26/19	H. Zimmer	B190	Confer with Chris Carty concerning complaint and discovery requests to the Cyrus Defendants	.10
11/26/19	H. Zimmer	B190	Analyze complaint concerning discovery requests for Cyrus Defendants	.20
11/26/19	H. Zimmer	B190	Review Schedule A's from Chris Carty	.60



Re: **Prepetition Transfer Litigation**

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11/26/19	J. D'Angelo	B190	Review filed complaint; review proposed Wachtell subpoena and begin editing same.	1.00
11/26/19	S. Smith	B190	Review filed complaint.	.50
11/27/19	C. Carty	B190	Analyze issues related to prepetition transfer litigation.	3.10
11/27/19	H. Zimmer	B190	Draft notice of subpoena and subpoenas	.40
11/27/19	H. Zimmer	B190	Revise discovery requests and send same to Chris Carty	.50
11/27/19	J. D'Angelo	B190	Extensive edits to proposed subpoenas for Wachtell Lipton, Richards Layton, and Aronstam; e-mails re: same.	3.60
11/27/19	S. O'Donnell	B190	Case admin	.20
11/29/19	C. Carty	B190	Analyze factual issues for discovery related to adversary complaint.	2.60
12/02/19	C. Carty	B190	Analyze issues related to third party discovery.	2.20
12/02/19	C. Carty	B190	Attend to issues related to service of complaint.	.70
12/02/19	C. Carty	B190	Review and analyze documents related to claims in litigation.	4.30
12/02/19	H. Zimmer	B190	Review rules on certificate/affidavits of service and service of Complaint and confer with managing attorneys concerning same	.40



Re: **Prepetition Transfer Litigation**

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12/02/19	H. Zimmer	B190	Review comments from Jason D'Angelo on subpoenas and confer with Chris Carty concerning same	.30
12/02/19	J. D'Angelo	B190	Emails re: non-party subpoenas and Cyrus subpoenas; revisions to law firm subpoenas.	.70
12/02/19	S. Smith	B190	Follow up review of final complaint.	.90
12/03/19	C. Carty	B190	Review and analyze documents related to claims in litigation.	2.60
12/03/19	C. Carty	B190	Analyze issues related to discovery and draft discovery requests.	2.30
12/03/19	C. Carty	B190	Analyze issues related to service of complaint.	.70
12/04/19	C. Carty	B190	Review and analyze documents related to claims in litigation.	2.20
12/05/19	C. Carty	B190	Meet with H. Zimmer and S. Stockman re Sears research assignments; prepare for meeting.	1.20
12/05/19	C. Carty	B190	Analyze legal issues related to adversary compliant.	3.10
12/05/19	C. Carty	B190	Review and analyze documents related to claims in litigation.	4.30
12/05/19	H. Zimmer	B190	Confer with Chris Carty and Silvia Stockman concerning Sears research and discovery	1.00
12/05/19	H. Zimmer	B190	Review outline from Chris Carty concerning issues for Sears conference call	.10



Re: **Prepetition Transfer Litigation**

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12/05/19	J. D'Angelo	B190	Status and strategy call with C. Carty re: non-party subpoenas, research to be conducted by junior associates; various emails re: meeting with Akin.	.60
12/05/19	S. Smith	B190	Review of complaint.	.80
12/06/19	C. Carty	B190	Review and analyze documents related to claims in litigation.	1.70
12/06/19	C. Carty	B190	Analyze legal issues related to adversary complaint.	3.10
12/06/19	H. Zimmer	B190	Confer with Chris Carty concerning service of subpoenas	.10
12/06/19	H. Zimmer	B190	Confer with managing attorneys concerning service of subpoenas and discovery requests and analyze rules on subpoenas and discovery requests	.40
12/06/19	J. D'Angelo	B190	E-mail with S. O'Donnell and C. Carty.; review additional materials relating to subpoenas.	1.60
12/08/19	S. O'Donnell	B190	Prepare for meet and confer	.50
12/09/19	C. Carty	B190	Review and analyze documents related to claims in litigation.	2.10
12/09/19	J. D'Angelo	B190	Emails with C. Carty and Akin re internal meeting next week and meeting with defendants' counsel; review additional materials on subpoenas to attorneys.	1.20
12/10/19	C. Carty	B190	Review and analyze documents and transcripts related to claims in litigation.	3.20



Re: **Prepetition Transfer Litigation**

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12/10/19	C. Carty	B190	Analyze discovery requests.	1.50
12/10/19	J. D'Angelo	B190	E-mail from C. Carty re: Scott Charles interview; review transcript of same, exhibits.	1.60
12/10/19	S. O'Donnell	B190	Coordinate discovery	.50
12/10/19	S. O'Donnell	B190	Claim review and due diligence	1.00
12/10/19	S. Smith	B190	Analysis of Wachtel transcript and related privilege issue and review email from C. Carty re same.	.50
12/11/19	C. Carty	B190	Review and analyze documents related to claims in litigation.	3.20
12/13/19	S. O'Donnell	B190	Prep for meet and confer and strategy meeting	1.50
12/16/19	C. Carty	B190	Analyze issues with third party discovery and serve subpoenas.	4.10
12/16/19	H. Zimmer	B190	Confer with Chris Carty and managing attorneys concerning third party subpoenas	.20
12/16/19	H. Zimmer	B190	Revise third-party discovery subpoenas for Wachtell, Ross Aaronstam, Robbins, Richard Layton, Girard Sharp, Gibbs Law Group, and Deloitte and draft notice of intent to serve subpoenas for same	2.20
12/16/19	H. Zimmer	B190	Revise and compile notice of intent, schedule A's, and subpoenas for service	.70
12/16/19	H. Zimmer	B190	Revise notice of intent with respect to wachtell and ross Richards layton	.20



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12/16/19	J. D'Angelo	B190	Review several non-party subpoenas; prepare for meeting at Akin.	1.70
12/16/19	S. O'Donnell	B190	Prep for meet and confer and f/up strategy meeting	1.00
12/17/19	C. Carty	B190	Meet with co-counsel re litigation.	.60
12/17/19	C. Carty	B190	Analyze issues related to discovery.	2.80
12/17/19	C. Carty	B190	Review and analyze documents related to claims in litigation.	2.20
12/17/19	C. Carty	B190	Participate in meet and confer among counsel and prepare for same.	1.80
12/17/19	J. D'Angelo	B190	Prepare for and participate in meet and confer with counsel for Defendants and participate in post-meeting discussion with Akin re: non-party subpoenas and strategy re: same; confer with S. O'Donnell re: same.	3.80
12/17/19	S. O'Donnell	B190	Priv analysis	1.00
12/17/19	S. O'Donnell	B190	Meet and confer w/ defense counsel	2.00
12/17/19	S. O'Donnell	B190	F/up Herrick meeting re same	1.00
12/17/19	S. O'Donnell	B190	F/up strategy meeting w/ Akin	1.00
12/18/19	G. Fromer	B190	Speak with partner about approach to case, factual issues and research timeline	.40
12/18/19	G. Fromer	B190	Read complaint and conduct factual analysis and issue spotting	1.50



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12/18/19	J. D'Angelo	B190	Confer with C. Carty re: team needs regarding document review, etc.	.20
12/18/19	S. O'Donnell	B190	Claim analysis	.40
12/18/19	S. O'Donnell	B190	Coordinate due diligence	.30
12/19/19	H. Zimmer	B190	Revise requests in light of amended complaint and input Chris's changes	.50
12/23/19	C. Carty	B190	Call with counsel for Wachtell regarding subpoena served (0.3); review and analyze subpoena to prepare for call (0.2).	.50
12/23/19	G. Fromer	B190	Read and analyze factual issues in court filings	3.00
12/24/19	G. Fromer	B190	Read and analyze court filings for factual and legal issues	3.10
12/26/19	C. Carty	B190	Analyze issues related to discovery (1.5); analyze documents produced to date (0.7).	2.20
12/26/19	G. Fromer	B190	Read and analyze court filings for factual and legal issues	6.00
12/27/19	C. Carty	B190	Analyze discovery issues (0.7); review and analyze confirmation order (0.5); review and analyze documents produced in discovery (2.7).	3.90
12/27/19	G. Fromer	B190	Review court materials and analyze factual and legal issues	1.90
12/27/19	J. D'Angelo	B190	Emails re: various subpoenas, etc.	1.00



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12/30/19	C. Carty	B190	Review and revise discovery requests (1.5, 0.3); review and analyze documents produced to date (2.1, 0.8); analyze case strategy (0.5).	5.20
01/02/20	C. Carty	B190	Review and analyze documents produced in discovery.	3.20
01/02/20	C. Carty	B190	Revise and finalize discovery requests to Cyrus defendants.	.90
01/02/20	C. Carty	B190	Analyze task list.	1.10
01/02/20	G. Fromer	B190	Speak with partner about research and writing assignment	.20
01/02/20	J. D'Angelo	B190	Review Plaintiff's first set of request for production of documents to the Cyrus defendants and e-mail re: same.	.50
01/02/20	S. O'Donnell	B190	Claim review	.30
01/03/20	C. Carty	B190	Review and analyze correspondence related to subpoenas.	1.50
01/03/20	C. Carty	B190	Review and analyze documents produced in discovery.	2.20
01/03/20	G. Fromer	B190	Conduct legal research and drafted memorandum to partner	5.20
01/03/20	J. D'Angelo	B190	Review additional subpoenas.	1.20
01/04/20	J. D'Angelo	B190	Follow up re: Cyrus defendants' discovery; review further background re: same.	.70



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01/06/20	C. Carty	B190	Analyze issues related to third party subpoenas and research related to burden.	2.50
01/06/20	E. Plowman	B190	Began reviewing Sears 2 complaint (Doc. 52, Case 19-08250-rdd, filed Nov. 25, 2019).	.90
01/06/20	G. Fromer	B190	Conduct legal research and drafted memorandum to partner	4.20
01/06/20	H. Zimmer	B190	Conduct Research on accounting privilege and cost-shifting	1.50
01/07/20	C. Carty	B190	Analyze issues related to discovery.	2.10
01/07/20	E. Plowman	B190	Review Sears complaint.	3.60
01/07/20	G. Fromer	B190	Conduct legal research and drafted memorandum to partner	2.70
01/07/20	J. D'Angelo	B190	Emails re: Relativity Database access and confirm same.	.20
01/09/20	C. Carty	B190	Review and analyze documents produced in discovery.	2.20
01/09/20	C. Carty	B190	Analyze privilege issues.	2.10
01/09/20	E. Plowman	B190	Continue reviewing complaint	2.30
01/09/20	H. Zimmer	B190	Review disclosure statement, confirmation order, docket and transcript concerning discovery issues	1.80
01/09/20	S. O'Donnell	B190	Confer re priv assertion/waiver	.50
01/10/20	C. Carty	B190	Call with Akin regarding document database.	.40
01/10/20	H. Zimmer	B190	Conference with Chris Carty and review the disclosure statement	.20



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01/10/20	H. Zimmer	B190	Finalize draft of objection	1.00
01/10/20	H. Zimmer	B190	Draft email concerning authority to obtain debtor's privileged documents and send same to Chris Caqerty	.80
01/13/20	C. Carty	B190	Review and analyze research related to discovery issues.	.70
01/13/20	H. Zimmer	B190	Conduct research concerning auditor objections to a subpoena and draft summary	1.80
01/13/20	H. Zimmer	B190	Conference with Chris Carty about Deloitte subpoena and researching concerning auditor's objections and burdens	.10
01/13/20	J. D'Angelo	B190	E-mail with H. Zimmer; review information re: basis for obtaining otherwise privileged documents and follow up re: same; discuss status of meet and confer scheduling, etc.	1.30
01/14/20	C. Carty	B190	Draft email to third party subpoena recipient re discovery issues and analyze same.	.80
01/14/20	C. Carty	B190	Review and analyze documents produced in prepetition investigation.	2.10
01/14/20	C. Carty	B190	Analyze third party discovery issues.	1.20
01/14/20	H. Zimmer	B190	Conference with Chris Carty concerning production from Wachtell, Paul Weiss, and strategy for discovery review of same	.60



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01/14/20	H. Zimmer	B190	Conduct research on subpoena to accountants and auditors and motions to quash based on undue burden and other objections	.90
01/14/20	H. Zimmer	B190	Conference with Linda Schepp concerning discovery review of meeting minutes and materials for information related to Wachtell and Deloitte, and advice from same	.40
01/14/20	H. Zimmer	B190	Review meeting minutes from Subcommittee	1.30
01/14/20	H. Zimmer	B190	Confer with Linda Schepp concerning discovery index for Wachtell and Deloitte review	.20
01/14/20	J. D'Angelo	B190	E-mail re: subpoena follow up and meet and confer.	.10
01/14/20	L. Schepp	B190	Reviewing/Editing/Drafting documents related to advice in meeting minutes and agendas for H. Zimmer	1.70
01/14/20	S. O'Donnell	B190	Case law review re subject matter waiver	.30
01/14/20	S. O'Donnell	B190	Confer w/ akin re priv issue	.20
01/14/20	S. O'Donnell	B190	Confer w/ team re priv issue	.20
01/15/20	C. Carty	B190	Analyze issues related to third party discovery.	1.90
01/15/20	C. Carty	B190	Review and analyze factual background.	2.50
01/15/20	H. Zimmer	B190	E-mail Wachtell counsel concerning conference for subpoena meet and confer	.10



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01/15/20	J. D'Angelo	B190	E-mail re: meet and confer.	.20
01/15/20	L. Schepp	B190	Reviewing/Editing/Drafting Documents relating to meeting minutes for H. Zimmer	6.80
01/16/20	C. Carty	B190	Attention to issues related to subpoena service.	1.10
01/16/20	C. Carty	B190	Review and analyze key documents from production.	1.80
01/16/20	H. Zimmer	B190	Revise subpoenas to third-parties gibbs law group and girard sharp and notice of subpoenas to defendants' concerning same after third-parties failed to accept service	1.10
01/16/20	J. D'Angelo	B190	Preparations for meet and confer with Wachtel re: non-party subpoenas.	.50
01/16/20	K. Kolb	B190	Analyze Akin Gump memo re potential claims	.70
01/16/20	L. Schepp	B190	Reviewing/Editing/Drafting Documents relating to meeting minutes for H. Zimmer	5.20
01/16/20	L. Schepp	B190	Meeting with K. Kolb regarding cases status	.40
01/16/20	S. O'Donnell	B190	Confer re priv analysis/Wachtel meet and confer	.50
01/17/20	C. Carty	B190	Analyze issues related to third party discovery.	.90
01/17/20	C. Carty	B190	Call with counsel to subpoena recipient.	.20



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01/17/20	C. Carty	B190	Analyze research related to privilege issues and related case law.	1.30
01/17/20	C. Carty	B190	Participate in case update call with co-counsel and prepare for same.	.80
01/17/20	C. Carty	B190	Review and analyze documents from investigation.	2.20
01/17/20	H. Zimmer	B190	Confer with Chris Carty concerning discovery	.10
01/17/20	H. Zimmer	B190	Analyze case concerning waiver of privilege with good faith/advice of counsel defense and conduct research on same	1.10
01/17/20	H. Zimmer	B190	Analyze email from Richard Layton and objections to subpoena	.30
01/17/20	H. Zimmer	B190	Confer with Wachtell concerning subpoena and document production	.40
01/17/20	H. Zimmer	B190	Review email from Wachtell concerning search terms used in production	.20
01/17/20	H. Zimmer	B190	Review research from Kyle Kolb in relation to waiver of privilege for advice of counsel defense and conduct additional research concerning same and review memorandum from akin	1.50
01/17/20	H. Zimmer	B190	Confer with Kyle Kolb concerning assignment on research into advice of counsel defense waiving privilege	.30



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01/17/20	J. D'Angelo	B190	Prepare for and participate in conference call/meet and confer re: Wachtel subpoena; review and consider search terms used by Wachtel for prior production.	1.50
01/17/20	K. Kolb	B190	Call with Akin Gump regarding privilege issues	.60
01/17/20	K. Kolb	B190	Discuss research with H. Zimmer regarding advise of counsel defense	.20
01/17/20	L. Schepp	B190	Reviewing/Editing/Drafting Documents related to Board of Directors Meetings per H. Zimmer	3.20
01/17/20	S. O'Donnell	B190	Adversary case law review	.50
01/17/20	S. O'Donnell	B190	Prep and participate in call w/ akin re misc. matters and priv assertion	.50
01/17/20	S. O'Donnell	B190	Coordinate analysis of misc. matters and priv assertion	.50
01/17/20	S. O'Donnell	B190	Case law review re misc. matters and priv assertion	.50
01/19/20	L. Schepp	B190	Reviewing/Editing/Drafting Documents related to Board of Directors Meetings per H. Zimmer	2.10
01/20/20	K. Kolb	B190	Review memo by Akin Gump regarding claims analysis	1.50
01/20/20	K. Kolb	B190	Review amended complaint	2.00
01/20/20	K. Kolb	B190	Review memo prepared by Akin Gump on privilege issues	.30
01/20/20	L. Schepp	B190	Reviewing/Editing/Drafting Documents relating to meeting minutes per H. Zimmer	3.40



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01/21/20	C. Carty	B190	Analyze research related to privilege issues.	1.50
01/21/20	C. Carty	B190	Strategize task list for discovery matters.	.70
01/21/20	C. Carty	B190	Review and analyze key documents produced in discovery.	1.20
01/21/20	H. Zimmer	B190	Conduct research concerning attorney client privilege, waiver of privilege for assertion of defenses	2.80
01/21/20	H. Zimmer	B190	Analyze amended complaint and meeting minutes and materials for search terms for discovery review	.70
01/21/20	H. Zimmer	B190	Analyze potential search terms for document review from wachtell production	.10
01/21/20	L. Schepp	B190	Reviewing/Editing/Drafting Documents relating to meeting minutes per H. Zimmer	.60
01/22/20	C. Carty	B190	Participate in team meeting re case status and document review and prepare for same.	2.10
01/22/20	C. Carty	B190	Confer with counsel to third party subpoena recipient.	.40
01/22/20	C. Carty	B190	Review and analyze key documents from productions.	1.30
01/22/20	E. Plowman	B190	Meeting re Sears 2 and upcoming document review.	1.00
01/22/20	G. Fromer	B190	Discuss research assignment on statute of limitations and choice of law for aiding and abetting claims	.10



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01/22/20	G. Fromer	B190	Discuss document review objectives	1.00
01/22/20	H. Zimmer	B190	Conduct research on cases cited in Phil Anker (Wilmer Hale) email on discovery of attorney client privileged materials	1.40
01/22/20	H. Zimmer	B190	Analyze cases from phil anker and draft conclusion as to whether directors automatically given privileged information from company and revise write-up on access to waiver of attorney-client privileged information where GF defense or advice of counsel defense is asserted	.40
01/22/20	H. Zimmer	B190	Analyze attorney-client privilege issues and meeting minutes of Sears	.20
01/22/20	H. Zimmer	B190	Meet concerning discovery issues and ongoing strategy for case	1.00
01/22/20	H. Zimmer	B190	Confer with Kyle Kolb and Chris Carty concerning privilege research and issues	.40
01/22/20	H. Zimmer	B190	Analyze research and confer with Chris Carty on discovery, choice of law, and attorney client privilege	.40



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01/22/20	J. D'Angelo	B190	Participate in team meeting to discuss Wachtell subpoena, document review, and other related issues; review research relating to privilege issue and purported automatic right of directors to view privileged communications ; consider same.	2.60
01/22/20	K. Kolb	B190	Revise research summary regarding scope of waiver and analyze underlying cases	2.00
01/22/20	K. Kolb	B190	Discuss privilege research with H. Zimmer	.20
01/22/20	K. Kolb	B190	Draft initial task list	.90
01/22/20	K. Kolb	B190	Attend team meeting regarding document review kickoff	.80
01/22/20	S. O'Donnell	B190	Prep and attend team meeting	1.00
01/23/20	C. Carty	B190	Review and analyze historical board materials.	1.30
01/23/20	C. Carty	B190	Review and analyze research memo.	1.20
01/25/20	K. Kolb	B190	Incorporate edits by G. Fromer to claims memo	.60
01/25/20	K. Kolb	B190	Analyze de-designated privileged documents for deposition preparation	.70
01/25/20	K. Kolb	B190	Analyze documents produced by Cyrus in connection with deposition preparation	.80
01/25/20	K. Kolb	B190	Revise claims analysis memo	2.00



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01/26/20	J. D'Angelo	B190	Emails re: P. Anker's position on privilege issues; review research re: same.	.60
01/26/20	K. Kolb	B190	Revise memo analyzing potential claims and discovery to date	1.20
01/27/20	C. Carty	B190	Analyze issues related to document review.	.80
01/27/20	C. Carty	B190	Meet with S. O'Donnell, J. D'Angelo, K. Kolb, and H. Zimmer re research and analysis related to discovery issues and prepare for same.	1.00
01/27/20	H. Zimmer	B190	Analyze research on waiver of privilege and confer with chris carty concerning same	.10
01/27/20	H. Zimmer	B190	Analyze notes from meeting and create list of issue tags for discovery review	.30
01/27/20	H. Zimmer	B190	Review waiver research and prepare for meeting	.80
01/27/20	H. Zimmer	B190	Conduct meeting with Sean O'Donnell, Chris Carty, and Kyle Kolb concerning privilege and discovery issues	.70
01/27/20	J. D'Angelo	B190	Participate in team call re: privilege issues and strategy re: same.	.50
01/27/20	K. Kolb	B190	Prepare for and attend meeting regarding privilege issues	1.30
01/27/20	K. Kolb	B190	Revise and finalize memo regarding document production summary and claims analysis	2.30



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01/27/20	K. Kolb	B190	Analyze documents produced by Deloitte	1.20
01/27/20	L. Schepp	B190	Reviewing/Editing/Drafting Documents related to Quinn and Stroock privilege, per K. Kolb	2.30
01/27/20	L. Schepp	B190	Reviewing/Editing/Drafting documents to compile timeline per K. Kolb.	3.30
01/27/20	S. O'Donnell	B190	Review priv analysis	.50
01/27/20	S. O'Donnell	B190	Confer w/ team re priv analysis	.50
01/28/20	C. Carty	B190	Review and analyze documents produced in investigation of prepetition claims.	2.30
01/28/20	C. Carty	B190	Review draft Rule 26(f) letter and provide comments thereto.	.50
01/28/20	J. D'Angelo	B190	Review team task list, and consider issues relating to Wachtell subpoena and document review.	.50
01/29/20	C. Carty	B190	Review and analyze documents produced in investigation of prepetition claims.	2.70
01/29/20	C. Carty	B190	Analyze issues related to document review and draft memorandum for associates.	2.40
01/29/20	C. Carty	B190	Analyze issues related to third party discovery.	.80
01/29/20	H. Zimmer	B190	Conduct research on waiver of privilege and when a party has to assert good faith and advice of counsel defense	1.30



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01/29/20	H. Zimmer	B190	Conduct research on waiver of privilege for assertion of counsel defense	1.10
01/29/20	H. Zimmer	B190	Conduct research on waiver of privilege and draft email summarizing same to Chris Carty	1.10
01/29/20	J. D'Angelo	B190	Review and consider instructions for document review concerning Wachtel prior production.	.30
01/30/20	C. Carty	B190	Analyze issues related to document review; meet with associates re same.	.80
01/30/20	C. Carty	B190	Analyze issues related to third party discovery.	.60
01/30/20	C. Carty	B190	Review and analyze documents produced in investigation of prepetition claims.	1.30
01/30/20	E. Plowman	B190	Review Sears 2 complaint to prepare for document review.	1.90
01/30/20	E. Plowman	B190	Review Wachtell documents.	6.10
01/31/20	C. Carty	B190	Analyze issues related to third party discovery from Deloitte.	.90
01/31/20	C. Carty	B190	Analyze issues related to third party discovery.	.50
01/31/20	C. Carty	B190	Review and analyze documents produced in investigation of prepetition claims.	1.50
01/31/20	E. Plowman	B190	Review Wachtell documents.	8.00
01/31/20	G. Fromer	B190	Review documents for issues and relevance	3.40



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01/31/20	K. Kolb	B190	Analyze documents produced by Deloitte	2.40
02/03/20	C. Carty	B190	Analyze issues related to discovery in prepetition transfer adversary proceeding.	1.90
02/03/20	E. Plowman	B190	Review complaint for review of Wachtell documents.	1.20
02/03/20	E. Plowman	B190	Review Wachtell documents.	7.80
02/03/20	G. Fromer	B190	Reviewed documents for relevance	1.50
02/04/20	C. Carty	B190	Review and analyze documents and consider discovery issues.	1.30
02/04/20	C. Carty	B190	Meet with K. Kolb re third party discovery of Deloitte and analyze issues related to such discovery.	1.10
02/04/20	C. Carty	B190	Draft discovery status update.	.80
02/04/20	H. Zimmer	B190	Confer with counsel in firm concerning subpoenas, Wachtell discovery	.40
02/04/20	K. Kolb	B190	Analyze documents produced by Deloitte in preparation for meet and confer	1.30
02/04/20	K. Kolb	B190	Analyze complaint	.20
02/04/20	K. Kolb	B190	Meet with C. Carty to discuss Deloitte meet and confer	.20
02/05/20	C. Carty	B190	Review and analyze documents related to prepetition transaction adversary proceeding.	1.70
02/05/20	C. Carty	B190	Attention to third party discovery.	.50



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02/05/20	H. Zimmer	B190	Conduct research on cost-shifting during discovery	.20
02/05/20	J. D'Angelo	B190	Review e-mail from J. Kane relating to agreement on privilege issues and proposal for storage and production of documents; review proposed Stipulation Concerning Prepetition Documents and Information Subject to Privilege; follow up with C. Carty re: Wachtell subpoena.	.60
02/05/20	K. Kolb	B190	Discuss privilege research with H. Zimmer	.10
02/05/20	K. Kolb	B190	Analyze documents produced by Deloitte in preparation for meet and confer re subpoena	3.00
02/05/20	K. Kolb	B190	Analyze research regarding auditor privileges	.70
02/05/20	K. Kolb	B190	Call with Lit Support regarding workpaper issue	.20
02/06/20	C. Carty	B190	Review and comment on draft expert engagement letters.	.40
02/06/20	G. Fromer	B190	Researched statute of limitations for potential claims	.30
02/06/20	J. D'Angelo	B190	Review e-mail (with spreadsheet attachments) from J. Kane re: process by which documents were produced during Rule 2004 discovery and price structure for the shared FTP site.	.60
02/06/20	K. Kolb	B190	Draft summary of Deloitte engagement and related issues	.70



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02/07/20	C. Carty	B190	Analyze issues related to third party discovery and prepare for meet and confer with Deloitte.	2.50
02/07/20	K. Kolb	B190	Meet with C. Carty re Deloitte meet and confer	.30
02/10/20	C. Carty	B190	Review and analyze materials provided by Deloitte related to Rule 2004 discovery.	1.20
02/10/20	C. Carty	B190	Meet and confer with Deloitte and Wilmer Hale re third party discovery subpoena.	.50
02/10/20	C. Carty	B190	Review and analyze documents related to prepetition transfer adversary proceeding.	1.20
02/10/20	E. Plowman	B190	Review Wachtell documents.	3.50
02/10/20	J. D'Angelo	B190	Review and consider final copy of letter to court filed by Plaintiffs on behalf of all parties re: case management, etc.	.20
02/10/20	K. Kolb	B190	Analyze going concern documents	.40
02/10/20	K. Kolb	B190	Meet and confer with Deloitte	.50
02/10/20	K. Kolb	B190	Analyze DT production cover letters	.40
02/11/20	C. Carty	B190	Attention to issues related to third party discovery.	.70
02/11/20	C. Carty	B190	Review and analyze Deloitte documents produced in connection with Rule 2004 investigation.	2.20
02/11/20	E. Plowman	B190	Review Wachtell documents.	4.30
02/11/20	G. Fromer	B190	Review documents for relevance	.20



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02/11/20	J. D'Angelo	B190	Review materials re: Wachtel and potential custodians and prepare plan for review of documents.	2.00
02/11/20	K. Kolb	B190	Analyze documents to identify potential Deloitte custodians	2.00
02/12/20	E. Plowman	B190	Review Wachtell documents.	.80
02/12/20	J. D'Angelo	B190	Confer/emails with team re: Wachtell document review, including specifically targeting potential additional custodians whose files should be searched; assign tasks related to same to L. Schepp.	1.80
02/12/20	K. Kolb	B190	Analyze documents in connection with drafting ESI protocol for Deloitte collection	3.80
02/12/20	L. Schepp	B190	Compile key names in production documents for use in fact discovery, per K. Kolb.	.50
02/13/20	C. Carty	B190	Analyze anticipated issues related to motions to dismiss in adversary proceeding.	.60
02/13/20	C. Carty	B190	Review and analyze documents related to prepetition transaction adversary proceeding.	1.50
02/13/20	J. D'Angelo	B190	Review e-mail from Court clerk, R. Drain.	.10
02/13/20	K. Kolb	B190	Analyze documents to draft ESI protocol	.70



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02/14/20	C. Carty	B190	Review and analyze documents related to prepetition transfer adversary proceeding.	1.10
02/14/20	C. Carty	B190	Review and analyze search terms and custodians re third party subpoena.	.60
02/14/20	E. Plowman	B190	Review Wachtell docs.	2.50
02/18/20	C. Carty	B190	Confer with R. Perio of Wilmer Hale re discovery and correspondence related to the same.	.50
02/18/20	C. Carty	B190	Review and analyze Cyrus responses and objections to document requests.	.50
02/18/20	C. Carty	B190	Meet and confer with recipients of third party subpoenas.	.40
02/18/20	E. Plowman	B190	Review Wachtell documents.	.80
02/18/20	J. D'Angelo	B190	Follow up on Wachtell document review status.	.20
02/18/20	K. Kolb	B190	Analyze documents provided by Deloitte to Restructuring Subcommittee	1.00
02/19/20	G. Fromer	B190	Review documents for relevance and categorized by issue	.70
02/19/20	J. D'Angelo	B190	Review materials relating to potential additional custodians.	.80
02/19/20	L. Schepp	B190	Update Board of Director's index.	.50
02/20/20	C. Carty	B190	Call with Akin regarding new third party discovery and analyze issues related thereto.	.60



Re: **Prepetition Transfer Litigation**

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02/20/20	C. Carty	B190	Review and analyze Cyrus responses and objections to document requests.	.40
02/20/20	E. Plowman	B190	Review Wachtell documents	1.70
02/20/20	J. D'Angelo	B190	Emails re: Cyrus responses to document requests and review same; emails and approve notice of appearance.	.60
02/21/20	C. Carty	B190	Call with Akin re potential third party discovery recipient and analyze issues related thereto.	.80
02/21/20	E. Plowman	B190	Review Wachtell documents.	3.00
02/21/20	G. Fromer	B190	Review documents for relevance and issues	.10
02/21/20	H. Zimmer	B190	Draft summary of Cyrus Defendants' responses to document requests, including deficiencies	.90
02/21/20	H. Zimmer	B190	Draft summary of Cyrus Defendants' responses to document requests and confer with Chis Carty concerning same	.80
02/21/20	K. Kolb	B190	Discuss Blackstone document requests	.20
02/21/20	K. Kolb	B190	Analyze motions to dismiss filings	1.50
02/21/20	K. Kolb	B190	Call with Akin Gump	.30
02/21/20	S. O'Donnell	B190	Coordinate discovery	.50
02/21/20	S. O'Donnell	B190	Review responses	.50
02/21/20	S. O'Donnell	B190	Review MTDs	.50
02/22/20	K. Kolb	B190	Analyze motions to dismiss	.50



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02/23/20	E. Plowman	B190	Review Wachtell documents	.60
02/23/20	H. Zimmer	B190	Review edits from Chris Carty concerning Cyrus Defendants' responses to document requests and finalize summary of Cyrus Defendants' responses to document requests, including deficiencies in responses	.30
02/23/20	J. D'Angelo	B190	Review MTDs; notice of adjournment, letter to Judge Drain, and emails re: same; create task list for team re: Wachtell document review.	2.80
02/24/20	E. Plowman	B190	Review Wachtell documents.	6.90
02/24/20	G. Fromer	B190	Review motions to dismiss and synthesized arguments	5.00
02/24/20	G. Fromer	B190	Discuss objectives of document review assignment	.20
02/24/20	H. Zimmer	B190	Confer with Gabrielle Fromer on document review and custodian list	.10
02/24/20	J. D'Angelo	B190	Emails re: Wachtell document review and gathering search terms and custodian names; emails re: Cyrus Defendants responses and objections to document requests.	1.00
02/24/20	K. Kolb	B190	Draft email re MTD analysis	.20
02/24/20	K. Kolb	B190	Draft email re proposed search terms and custodians	.20
02/24/20	K. Kolb	B190	Analyze motion to dismiss by Cyrus	.70



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02/24/20	L. Schepp	B190	Compile and track upcoming case deadlines.	.10
02/25/20	H. Zimmer	B190	Review edits to deloitte document search parameters from Kyle Kolb and confer with Kyle Kolb on same	.20
02/25/20	H. Zimmer	B190	Draft document search parameters for Deloitte to be sent to Deloitte and WilmerHale	1.20
02/25/20	J. D'Angelo	B190	Email from K. Kolb re: search terms and review same, confer with H. Zimmer re: same.	.40
02/25/20	K. Kolb	B190	Discuss search terms for Deloitte subpoena	.20
02/25/20	K. Kolb	B190	Revise search term protocol for Deloitte	1.40
02/26/20	E. Plowman	B190	"Review Wachtell documents."	1.80
02/26/20	E. Plowman	B190	Begin reviewing defendants' motions to dismiss.	1.70
02/26/20	G. Fromer	B190	Review and outline opposing counsels motions to dismiss	.10
02/26/20	H. Zimmer	B190	Review running custodian list of WLRK and Deloitte individuals, update deloitte document subpoena search parameters, confer with Kyle Kolb concerning Deloitte subpoena, and review and draft search terms for deloitte document parameters	1.10
02/26/20	H. Zimmer	B190	Confer with Jason D'Angelo on wachtell subpoena search term parameters	.20



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02/26/20	J. D'Angelo	B190	Call with H. Zimmer re: Wachtell review; emails to/from K. Kolb re: "Project Madison;" review notices of numerous filings and review order re: voluntary dismissal against Official Committee of Unsecured Creditors and review Supplemental Order Granting Debtors' First Objection to Proofs of Claim; review notices of intent to serve subpoenas.	.80
02/26/20	K. Kolb	B190	Analyze Blackstone documents in connection with potential subpoena	.60
02/26/20	K. Kolb	B190	Revise search terms	.50
02/26/20	K. Kolb	B190	Analyze cases relied upon in motion to dismiss	1.90
02/26/20	K. Kolb	B190	Discuss search terms with L. Schepp	.20
02/26/20	L. Schepp	B190	Work on revisions to search terms	.30
02/27/20	E. Plowman	B190	Review defendants' motions to dismiss.	5.20
02/27/20	H. Zimmer	B190	Analyze and revise deloitte search term parameters based on additions from Wilmer Hale and confer with Kyle Kolb concerning same	.30
02/27/20	J. D'Angelo	B190	Emails from team re: progress on Wachtell document review; follow up re: same.	.30
02/27/20	K. Kolb	B190	Revise search terms and discuss internally	.40



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02/27/20	K. Kolb	B190	Discuss motion to dismiss research with E Plowman	.10
02/27/20	K. Kolb	B190	Email to Wilmer Hale re subpoena	.10
02/27/20	K. Kolb	B190	Discuss review process with L Schepp	.50
02/27/20	K. Kolb	B190	Call with H5	.30
02/27/20	K. Kolb	B190	Analyze cases relied upon in motions to dismiss	1.00
02/27/20	K. Kolb	B190	Analyze Fairholme and Cyrus motions and draft template for summary chart	2.90
02/27/20	L. Schepp	B190	Revise search terms with K. Kolb	1.60
02/27/20	L. Schepp	B190	Work with K. Kolb regarding H5 Relativity workspace status	1.50
02/28/20	E. Plowman	B190	Continue reviewing defendants' motions to dismiss.	4.50
02/28/20	E. Plowman	B190	Review defendants' motions to dismiss.	3.40
02/28/20	G. Fromer	B190	Review motions to dismiss and synthesize arguments	.70
02/28/20	G. Fromer	B190	Review section of complaint on Seritage transaction to assist with issue spotting in document review on Seritage emails	.90
02/28/20	G. Fromer	B190	Review documents for relevance	.40
02/28/20	J. D'Angelo	B190	Review numerous emails re: various filings and re: motions to dismiss; review same.	1.00



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02/28/20	K. Kolb	B190	Analyze and revise summaries of motions to dismiss	2.50
02/28/20	K. Kolb	B190	Analyze cases relied upon in Cyrus motion to dismiss	2.00
02/28/20	K. Kolb	B190	Email to Deloitte regarding subpoena response	.30
02/28/20	S. O'Donnell	B190	Coordinate discovery	.50
02/29/20	K. Kolb	B190	Analyze cases relied upon in motion to dismiss	1.00
02/29/20	K. Kolb	B190	Revise summaries of motions to dismiss	1.50
Total				\$334,508.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
S. O'Donnell	18.90	985.00	18,616.50
J. D'Angelo	23.90	845.00	20,195.50
J. D'Angelo	29.50	810.00	23,895.00
C. Carty	84.50	785.00	66,332.50
S. Smith	7.20	725.00	5,220.00
K. Kolb	58.20	610.00	35,502.00
C. Carty	121.90	610.00	74,359.00
H. Zimmer	34.20	435.00	14,877.00
E. Plowman	73.50	420.00	30,870.00
G. Fromer	26.90	420.00	11,298.00



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<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
H. Zimmer	18.90	400.00	7,560.00
G. Fromer	15.90	400.00	6,360.00
L. Schepp	33.50	335.00	11,222.50
S. O'Donnell	8.00	1025.00	8,200.00

DISBURSEMENTS

Shipping	35.44
Online Research	1,798.79
Process Servers	3,325.32
Meals	112.04
Pacer Charges	12.90
Document Processing	48.00
Duplicating Supplies	128.46
Velobind/binding	30.00
Duplication	2,063.84

Total disbursements	\$7,554.79
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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
<u>Contested Matters (exclu. assumption/rejection) - B190</u>		
	555.00	\$334,508.00
Subtotals	555.00	\$334,508.00



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

April 20, 2020
Bill Number: 354103
File Number: 19609-0002

Re: Jointly Asserted Causes of Action

Fees for legal services rendered through March 31, 2020	\$291,722.00
Expenses posted through March 31, 2020	203.09
TOTAL	\$291,925.09

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
03/02/20	C. Carty		Analyze and strategize regarding discovery from Wachtell.	1.70
03/02/20	E. Plowman		Review Wachtell documents.	1.70
03/02/20	G. Fromer		Review documents for relevant issues	7.00
03/02/20	J. D'Angelo		Confer with S. O'Donnell re: staffing re: Wachtell review and progress re: same; review numerous filing notifications.	.60
03/02/20	K. Kolb		Revise chart summarizing defendants' arguments	3.00
03/02/20	K. Kolb		Research for motion to dismiss	2.50
03/02/20	K. Kolb		Discuss opposition brief legal issues with GU	.30
03/02/20	S. O'Donnell		Coordinate discovery.	.30
03/03/20	C. Carty		Correspondence re conflict issues regarding third party discovery.	.60
03/03/20	C. Carty		Analyze and strategize regarding discovery from Wachtell.	2.50
03/03/20	E. Plowman		Review Wachtell documents.	6.60
03/03/20	G. Fromer		Review documents for relevant issues	7.00
03/03/20	H. Zimmer		Analyze and code documents on relativity for issue tags	.40



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03/03/20	H. Zimmer	Confer with Kyle Kolb on search parameters for subpoena and document review	.30
03/03/20	H. Zimmer	Confer with Jason D'Angelo and Kyle Kolb concerning subpoena and search term parameters	.20
03/03/20	J. D'Angelo	Confer with team re W document review and compilation of additional custodians and search terms; review current list and custodian list; emails with C. Carty, K. Kolb and E. Plowman re: same.	1.00
03/03/20	K. Kolb	Revise Blackstone requests	.30
03/03/20	K. Kolb	Draft parameters for subpoena response	.70
03/03/20	L. Schepp	Review H5 Relativity workspace for relevant documents for review	3.40
03/04/20	C. Carty	Meet with litigation team regarding discovery status in adversary proceeding regarding prepetition transactions.	.80
03/04/20	C. Carty	Analyze and strategize issues related to third party discovery.	1.40
03/04/20	E. Plowman	Review analyze documents produced in adversary proceeding Wachtell documents.	2.40
03/04/20	E. Plowman	Meeting re Wachtell document review.	.60
03/04/20	G. Fromer	Reviewed documents for relevant issues	.70



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03/04/20	G. Fromer	Discussed document review objectives, serving subpoenas, and responding to motion to dismiss	.50
03/04/20	H. Zimmer	Meeting concerning case status and document review	.50
03/04/20	H. Zimmer	Draft wachtell search term list and confer with Gabrielle Fromer and Elizabeth Plowman	.40
03/04/20	J. D'Angelo	Confer with C. Carty, G. Fromer and K. Kolb re: WLRK documents relating to KCD IP Valuation and review latest draft of WLRK search terms.	1.60
03/04/20	K. Kolb	Attend meeting regarding document review progress and related issues	.60
03/04/20	K. Kolb	Revise Blackstone requests	.10
03/04/20	K. Kolb	Email re Wachtell terms	.30
03/04/20	L. Schepp	Strategy meeting regarding document review, per S. O'Donnell.	.70
03/04/20	L. Schepp	Work with H5 and case team regarding searches and document review strategy.	5.60
03/04/20	S. O'Donnell	Team meeting; strategy and analysis; coordinate discovery	1.20
03/05/20	C. Carty	Analyze and strategize issues related to third party discovery.	2.10
03/05/20	C. Carty	Review and analyze motion to dismiss briefing.	2.20



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03/05/20	C. Carty	Participate in call with co-counsel regarding status of discovery.	.50
03/05/20	G. Fromer	Discussed document review timeline objectives	.20
03/05/20	H. Zimmer	Confer with Chris Carty concerning wachtell search term list	.20
03/05/20	J. D'Angelo	Review e-mail and correspondence between J. Sorkin and P. Anker; follow up re: WLRK review.	.40
03/05/20	K. Kolb	Discuss threading options with L Schepp	.30
03/05/20	K. Kolb	Discuss meet and confer issues with LS	.30
03/05/20	L. Schepp	Review H5 workspace with vendor for document review workflow with email threading.	3.40
03/05/20	L. Schepp	Confirm names for Wachtell domains, per K. Kolb	3.60
03/06/20	J. D'Angelo	Emails re: WLRK review and use of H5 threading analytics tool to reduce population of documents to be reviewed; review various correspondence among counsel for all parties; review latest list of custodians and new search terms.	1.10
03/06/20	L. Schepp	Work with vendor and case team regarding email threading in preparation for document review, per K. Kolb	7.20
03/06/20	S. O'Donnell	Supervise discovery team progress.	.20



Re: **Jointly Asserted Causes of Action**

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03/07/20	H. Zimmer	Review documents on relativity and code for relevance and issue tags	.20
03/07/20	K. Kolb	Review and analyze threading presentation from vendor	1.00
03/07/20	K. Kolb	Analyze documents using threading analytics tool	1.00
03/07/20	L. Schepp	Create various searches for document review in Relativity workspace, per K. Kolb.	1.10
03/08/20	H. Zimmer	Conduct research into Blackstone and revise cover page for Blackstone subpoena and notice of intent to serve subpoena	.70
03/09/20	C. Carty	Analyze Cyrus responses and objections to document requests in preparation for meet and confer.	.80
03/09/20	E. Plowman	Training for review of documents.	2.50
03/09/20	G. Fromer	Review documents for relevant issues	.30
03/09/20	G. Fromer	Discuss organization and efficiency of threading document review	2.80
03/09/20	H. Zimmer	Review video on threading for Sears review	.80
03/09/20	H. Zimmer	Conference on document threading for Sears review and review documents using thread view er and confer with Kyle Kolb, Gabrielle Fromer, Linda Schepp, and Liz Plowman on same	2.10



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03/09/20	H. Zimmer	Confer with Kyle Kolb and Chris Carty concerning Blackstone subpoena	.20
03/09/20	J. D'Angelo	Catch up on numerous filings.	.40
03/09/20	K. Kolb	Prepare for and attend training regarding threading	1.40
03/09/20	K. Kolb	Train associates on threading	.70
03/09/20	K. Kolb	Discuss Cyrus discovery issues with HZ	.20
03/09/20	K. Kolb	Revise Blackstone subpoena and serve on counsel	.80
03/09/20	K. Kolb	Analyze motions to dismiss	.50
03/09/20	K. Kolb	Analyze documents from Wachtell	1.00
03/09/20	L. Schepp	Working with vendor and case team regarding document review workflow.	5.60
03/09/20	L. Schepp	Update domain list from Relativity,	5.40
03/10/20	C. Carty	Analyze and draft search parameters for Wachtell discovery.	3.30
03/10/20	C. Carty	Analyze response to motions to dismiss.	1.60
03/10/20	E. Plowman	Review Wachtell documents.	6.10
03/10/20	G. Fromer	Review documents for relevant issues	3.80
03/10/20	G. Fromer	Discuss organization and efficiency of threading document review	.80
03/10/20	H. Zimmer	Review wachtell list and confer on same	.40



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03/10/20	H. Zimmer	Review emails from Blackstone regarding subpoena and Akin Gump and Herrick's response to same	.40
03/10/20	H. Zimmer	Draft agenda for meet and confer with Cyrus	.30
03/10/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	3.90
03/10/20	J. D'Angelo	Review/propose edits to search terms and custodians list; emails re: same; confer with team re: document review status and emails re: same; review additional domain names extracted from database.	2.00
03/10/20	K. Kolb	Further analysis of motions to dismiss	.30
03/10/20	K. Kolb	Revise Wathell terms and parameters	.30
03/10/20	K. Kolb	Analyze documents produced by Wathell and discuss with LS	3.20
03/10/20	K. Kolb	Analyze review protocol and plan	.20
03/10/20	L. Schepp	Update domain list for identifying potential custodians	5.40
03/10/20	L. Schepp	Working with case team regarding document review protocol.	2.20
03/11/20	C. Carty	Prepare for meet and confer re Cyrus discovery.	1.50
03/11/20	C. Carty	Participate in discovery meet and confer.	.50



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03/11/20	E. Plowman	Analyze documents produced in adversary proceeding.	7.10
03/11/20	H. Zimmer	Confer with Kyle Kolb on Blackstone meet and confer, review documents on relativity for blackstone terms and email Kyle Kolb a copy of Blackstone term sheet	.50
03/11/20	H. Zimmer	Call with Cyrus and draft summary of call	.90
03/11/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.70
03/11/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.60
03/11/20	H. Zimmer	Review compiled list of Cyrus players from relativity	.10
03/11/20	H. Zimmer	Review emails from Blackstone counsel	.10
03/11/20	J. D'Angelo	Emails with C. Carty and K. Kolb; handle request per same regarding S. Charles interview; emails re: document review progress and related issues.	.40
03/11/20	K. Kolb	Review privilege stipulation	.20
03/11/20	K. Kolb	Analyze objections in preparation for meet and confer	.30
03/11/20	K. Kolb	Email regarding review instructions	.30



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03/11/20	K. Kolb	Attend meet and confer with counsel for Cyrus defendants	.50
03/11/20	K. Kolb	Draft potential Cyrus parameters	.20
03/11/20	L. Schepp	Update domain list for Cyrus and Wachtell names	2.80
03/12/20	C. Carty	Analyze issues related to Cyrus discovery positions.	1.20
03/12/20	E. Plowman	Analyze documents produced in adversary proceeding.	8.50
03/12/20	G. Fromer	Review documents for relevant issues	2.10
03/12/20	H. Zimmer	Prepare for call with Blackstone counsel and conference call with counsel at Blackstone concerning subpoena issued	.60
03/12/20	H. Zimmer	Review documents on Sears' loan and confer with Chris Carty on same, Kyle Kolb, and Gabrielle Fromer on same	.30
03/12/20	H. Zimmer	Review memorandum on pre-petition financing transactions	.80
03/12/20	H. Zimmer	Email Kyle Kolb materials for blackstone meet and confer on subpoena	.10
03/12/20	H. Zimmer	Analyze protective order entered into case for whether it is permissible to disclose documents produced in litigation to third-party, Blackstone and confer with kyle Kolb on same	.30



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03/12/20	H. Zimmer	Review emails between Herrick and akin gump on discovery timing	.10
03/12/20	H. Zimmer	Confer with Kyle Kolb and confer with Gabrielle Fromer on discovery review	.20
03/12/20	H. Zimmer	Analyze documents on relativity and code for relevance and issues	.50
03/12/20	H. Zimmer	Confer with Kyle Kolb concerning discovery related issues, including Blackstone, doc review, and pre-petition memo	.20
03/12/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.70
03/12/20	K. Kolb	Discuss doc review issues with HZ	.30
03/12/20	K. Kolb	Review interview from Rule 2004 investigation	.90
03/12/20	K. Kolb	Meet and confer with Blackstone	.40
03/12/20	K. Kolb	Supervise document review	.20
03/12/20	K. Kolb	Email to Akin regarding subpoena	.20
03/12/20	K. Kolb	Prepare for meet and confer	.20
03/12/20	L. Schepp	Finalize domain list	1.30
03/12/20	L. Schepp	Create hot documents search in H5 workspace for K. Kolb	.20
03/13/20	C. Carty	Call with Herrick team regarding motions to dismiss.	.30
03/13/20	C. Carty	Call with co-counsel re strategy for motions to dismiss.	.50



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03/13/20	C. Carty	Review and analyze motions to dismiss and strategize responses thereto.	2.90
03/13/20	C. Carty	Review and analyze outline and draft response to Cyrus motion to dismiss arguments.	2.10
03/13/20	E. Plowman	Analyze documents produced in investigation.	6.70
03/13/20	G. Fromer	Review documents for relevant issues	2.80
03/13/20	J. D'Angelo	Review 26(f) proposal; e-mail re: same.	.60
03/13/20	K. Kolb	Supervise review of documents	.30
03/13/20	K. Kolb	Analyze draft 26(f) report	.30
03/13/20	K. Kolb	Draft emails to counsel for Blackstone and Morritt	.50
03/13/20	K. Kolb	Attend calls regarding motion to dismiss oppositions	1.10
03/13/20	L. Schepp	Work with attorneys regarding document review workflow	.70
03/14/20	H. Zimmer	Analyze documents on relativity database and code documents for responsive and relevant issues	1.10
03/14/20	H. Zimmer	Analyze documents on relativity database and code documents for responsive and relevant issues	2.00
03/14/20	K. Kolb	Review transcript of interview of Scott Charles	1.00



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03/15/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.40
03/15/20	H. Zimmer	Review production on relativity for eastdil and blackstone related documents in anticipation of meet and confer with Blackstone and confer with Kyle Kolb regarding same	.80
03/15/20	L. Schepp	Work on domain searches for Blackstone entity	.40
03/16/20	C. Carty	Analyze conflicts issues related to third party discovery.	.60
03/16/20	E. Plowman	Review third party production.	8.40
03/16/20	G. Fromer	Review documents for relevant issues	1.80
03/16/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.80
03/16/20	H. Zimmer	Email Akin Gump concerning Eastdil production in relation to Blackstone subpoena	.20
03/16/20	K. Kolb	Call with Dani Marlow regarding Blackstone subpoena	.10
03/16/20	K. Kolb	Email to Wilmer Hale regarding Blackstone subpoena	.20
03/16/20	K. Kolb	Supervise review	.20
03/16/20	K. Kolb	Analyze transcript of S Charles interview	.50



Re: **Jointly Asserted Causes of Action**

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03/17/20	C. Carty	Draft updates to third party discovery status and analyze issues related thereto.	1.90
03/17/20	C. Carty	Draft search parameters for third party discovery.	.60
03/17/20	C. Carty	Analyze research with respect to Cyrus motion to dismiss.	1.80
03/17/20	E. Plowman	Analyze documents produced by third party	4.80
03/17/20	E. Plowman	Sears 2 call	.60
03/17/20	G. Fromer	Discuss additional document production	.50
03/17/20	G. Fromer	Review documents for relevant issues	1.50
03/17/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.50
03/17/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	2.10
03/17/20	H. Zimmer	Conference call with Chris re: various claims and background on loans and projects entered into by Sears and email Kyle Kolb, Gabrielle Fromer, and Elizbeth Plowman on same	.30
03/17/20	H. Zimmer	Confer with Kyle Kolb on eastdil production for blackstone related subpoena	.10



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03/17/20	H. Zimmer	Confer with Kyle Kolb and Linda Schepp on blackstone searches	.20
03/17/20	H. Zimmer	Confer with Chris Carty, Sean O'Donnell, Kyle Kolb, Elizabeth Plowman, and Gabrielle Fromer re discovery-related issues with productions from parties and document review	.20
03/17/20	J. D'Angelo	Emails re: search parameters and re: document review progress; e-mail re: various filings.	.40
03/17/20	K. Kolb	Call re status of discovery.	.40
03/17/20	K. Kolb	Analyze Wilmer Hale revisions to Wachtell ESI parameters	.20
03/17/20	K. Kolb	Supervise review by answering questions from team and related analysis of documents produced by Wachtell	.80
03/17/20	K. Kolb	Conduct second level review	.50
03/17/20	L. Schepp	Review production documents related to Blackstone.	3.10
03/17/20	S. O'Donnell	Confer w/ team re discovery; confer w/ DZ of Akin re same; f/up w/ team re same.	1.00
03/18/20	C. Carty	Call with S. O'Donnell re third party discovery status and next steps.	.50
03/18/20	C. Carty	Correspond with subpoena recipients regarding third party discovery status and analyze same.	1.50



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03/18/20	C. Carty	Review and analyze case law related to Cyrus motion to dismiss.	1.10
03/18/20	E. Plowman	Analyze documents produced in response to subpoena.	8.30
03/18/20	G. Fromer	Review documents for relevant issues	1.90
03/18/20	H. Zimmer	Revise working document with terms and background information for Sears 2 document review and confer with Kyle Kolb on same	.20
03/18/20	H. Zimmer	Review emails on subpoena issues and draft of email to Wachtell	.30
03/18/20	H. Zimmer	Confer on Sears with Kyle Kolb, Chris Carty, and Gabrielle Fromer regarding discovery issues	.40
03/18/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.40
03/18/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.90
03/18/20	J. D'Angelo	E-mail re: document review.	.10
03/18/20	K. Kolb	Call with SO and CC regarding meet and confer negotiations	.50
03/18/20	K. Kolb	Draft email to Deloitte regarding subpoena response	.20
03/18/20	K. Kolb	Draft proposed ESI parameters for Cyrus defendants and analyze documents to inform these	1.70



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03/18/20	K. Kolb	Analyze outline and draft of portion of motion to dismiss opposition	.70
03/18/20	K. Kolb	Draft first-level review protocol document	.90
03/18/20	K. Kolb	Supervise document review and email further instructions to team	.50
03/18/20	S. O'Donnell	Confer w/ CC and KK re expediting discovery; review/comment on W correspondence; akin update re same; confer w/ HZ.	1.20
03/19/20	C. Carty	Review and analyze documents from document productions in connection with prepetition transfer adversary proceeding.	1.20
03/19/20	E. Plowman	Analyze documents produced in adversary proceeding.	4.70
03/19/20	G. Fromer	Review documents for relevant issues	.80
03/19/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	3.20
03/19/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.40
03/19/20	H. Zimmer	Review scott Charles interview	.40



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03/19/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.80
03/19/20	K. Kolb	Supervise review	.10
03/20/20	C. Carty	Review and analyze production in connection with prepetition transfer adversary proceeding.	2.80
03/20/20	C. Carty	Analyze issues related to discovery in connection with prepetition transfer adversary proceeding.	2.10
03/20/20	E. Plowman	Analyze documents produced in adversary proceeding.	2.40
03/20/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.70
03/20/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.60
03/20/20	K. Kolb	Supervise document review of Wachtell production	.30
03/20/20	K. Kolb	Analyze draft of portion of motion to dismiss opposition	1.00
03/21/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.20



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03/21/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.50
03/22/20	K. Kolb	Supervise document review and analyze additional documents from Wachtell	.20
03/23/20	C. Carty	Review and revise draft letter to Wachtell regarding discovery in connection with prepetition transfer adversary proceeding.	.50
03/23/20	C. Carty	Draft third party discovery status update.	1.80
03/23/20	C. Carty	Analyze proposed Wachtell searches for third party discovery in preparation for meet and confer.	.80
03/23/20	C. Carty	Meet and confer with counsel from Wachtell regarding subpoena in connection with prepetition transfer adversary proceeding and prepare for same.	1.00
03/23/20	C. Carty	Call with co-counsel at Akin Gump regarding status of third party discovery.	.50
03/23/20	C. Carty	Review and analyze Wachtell documents in connection with prepetition transfer adversary proceeding.	3.20
03/23/20	E. Plowman	Analyze documents produced in adversary proceeding.	9.10
03/23/20	G. Fromer	Review documents for relevant issues	6.40



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03/23/20	H. Zimmer	Conference call with Akin Gump, Chris Carty, Kyle Kolb, and Sean O'Donnell concerning discovery dispute with Wachtell	.60
03/23/20	H. Zimmer	Conference call with counsel at Wachtell and Wilmer Hale concerning discovery	.70
03/23/20	H. Zimmer	Conference call with Chris Carty, Sean O'Donnell, and Kyle Kolb concerning discovery from Wachtell	.30
03/23/20	H. Zimmer	Draft email to Wachtell and confer with Chris Carty concerning same	.80
03/23/20	H. Zimmer	E-mail Elizabeth Plowman and Gabrielle Plowman concerning document review	.20
03/23/20	H. Zimmer	Confer with Kyle Kolb on document review	.20
03/23/20	H. Zimmer	Review complaint and Scott Charles interview for issues for doc review	.30
03/23/20	K. Kolb	Analyze interview of Scott Charles	1.50
03/23/20	K. Kolb	Meet and confer with Wachtell and follow-up call	1.00
03/23/20	K. Kolb	Call with Akin Gump to discuss third party discovery	.50
03/23/20	K. Kolb	Discuss review status with HZ	.20
03/23/20	K. Kolb	Second level review of Wachtell production and related review item	3.90



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03/23/20	S. O'Donnell	Coordinate doc review; prep and participate in Wachtell discovery call; confer w/ team re same; coordinate call w/ akin re same; prep and participate in same; coordinate f/up w/ Wachtell and doc review.	2.50
03/24/20	C. Carty	Analyze issues in connection with discovery related to prepetition transfer adversary proceeding.	2.90
03/24/20	C. Carty	Analyze issues related to Cyrus motion to dismiss.	1.20
03/24/20	C. Carty	Review and analyze Deloitte comments to proposed searches in connection with third party discovery.	.30
03/24/20	C. Carty	Call with document review team regarding review status in connection with prepetition transfer adversary proceeding.	.50
03/24/20	C. Carty	Revise and draft portions of letter to Wachtell regarding discovery in connection with prepetition transfer adversary proceeding.	4.20
03/24/20	C. Carty	Call with Richards Layton and Wilmer Hale in connection with third party discovery subpoena related to prepetition transfer adversary proceeding and prepare for same.	.70
03/24/20	E. Plowman	Analyze documents produced in adrversary proceeding.	5.60



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03/24/20	E. Plowman	Review depo transcript	2.70
03/24/20	E. Plowman	Internal team meeting re doc review	1.00
03/24/20	G. Fromer	Review documents for relevant issues	6.60
03/24/20	G. Fromer	Discuss document review objectives and strategy	.50
03/24/20	H. Zimmer	Confer with Kyle Kolb, Sean O'Donnell, and Chris Carty concerning discovery on Wachtell and Confer with Kyle Kolb and Chris Carty concerning discovery on Deloitte	.30
03/24/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	3.50
03/24/20	H. Zimmer	Confer with Kyle Kolb and Chris Carty on discovery	.30
03/24/20	J. D'Angelo	Review progress on document review.	.30
03/24/20	K. Kolb	Call with review team regarding Wachtell issues	.50
03/24/20	K. Kolb	Revise letter to Wachtell	.60
03/24/20	K. Kolb	Analyze response on ESI parameters from Deloitte	.20
03/24/20	K. Kolb	Conduct second-level review of Wachtell production review	5.80



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03/24/20	S. O'Donnell	Review/revise correspondence to Wachtell re discovery; coordinate doc review; hot docs; confer w/ DC re Wilmer correspondence.	1.50
03/25/20	C. Carty	Call with S. O'Donnell re letter to Wachtell regarding discovery in prepetition transfer adversary proceeding.	.40
03/25/20	C. Carty	Revise and finalize letter to Wachtell regarding discovery in connection with prepetition transfer adversary proceeding.	1.60
03/25/20	C. Carty	Analyze issues related to document review in connection with prepetition transfer adversary proceeding.	1.80
03/25/20	C. Carty	Review and analyze documents in connection with prepetition transfer adversary proceeding.	1.40
03/25/20	E. Plowman	Analyze documents produced in adversary proceeding.	8.60
03/25/20	G. Fromer	Review documents for relevant issues	7.00
03/25/20	H. Zimmer	Confer with Kyle Kolb, Gabrielle Fromer, Linda Schepp, Chris Carty concerning discovery review	.40
03/25/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	2.30
03/25/20	H. Zimmer	Confer with Kyle Kolb and Chris Carty on discovery	.30



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03/25/20	K. Kolb	Attend to first level review issues and supervision	1.70
03/25/20	K. Kolb	Discuss review issues with HZ	.40
03/25/20	K. Kolb	Emails regarding additional subpoenas	.20
03/25/20	L. Schepp	Compile documents related to Cleary Gottlieb for attorney review.	1.60
03/25/20	L. Schepp	Analyze H5 treading in review batches, per K. Kolb.	3.90
03/25/20	S. O'Donnell	Review/revise letter to wachtell; confer w/ akin re same; add'l revisions to same.	1.00
03/26/20	C. Carty	Review and analyze Deloitte notes regarding search terms and custodians.	1.10
03/26/20	C. Carty	Participate in meet and confer call with Deloitte regarding search parameters for discovery in connection with prepetition transfer adversary proceeding and prepare for same.	.80
03/26/20	C. Carty	Analyze issues related to document review in connection with prepetition transfer adversary proceeding.	1.20
03/26/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	2.30



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03/26/20	C. Carty	Review and analyze research related to Cyrus motion to dismiss response.	2.20
03/26/20	D. Field	Telephone conference with K. Kolb, H. Zimmer, and S. Stockman regarding document review.	1.00
03/26/20	D. Field	Review production for responsive and hot documents.	5.90
03/26/20	E. Plowman	Analyze documents produced in adversary proceeding.	3.00
03/26/20	G. Fromer	Review documents for relevant issues	7.00
03/26/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.10
03/26/20	H. Zimmer	Conference call with Kyle Kolb, Silvia Stockman, and Dan Field concerning document review and matter	1.00
03/26/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.30
03/26/20	H. Zimmer	Confer with Kyle Kolb on deloitte search parameters and prepare for meet and confer with Deloitte	.20
03/26/20	H. Zimmer	Conference call with Deloitte and Wilmer Hale on subpoena	.50



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03/26/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.00
03/26/20	H. Zimmer	Revise memorandum on document review	.30
03/26/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.00
03/26/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.40
03/26/20	H. Zimmer	Conduct review of documents from Eastdil and draft search terms for Blackstone meet and confer	1.60
03/26/20	H. Zimmer	Confer with Kyle Kolb on document review	.10
03/26/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.10
03/26/20	J. D'Angelo	Review e-mail notices of latest filings.	.50
03/26/20	K. Kolb	Training and background summary call with HZ, SS, and DF	1.00
03/26/20	K. Kolb	Attend meet and confer with Deloitte	.50
03/26/20	K. Kolb	Supervise first level review and discuss related issues with team	1.80



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03/27/20	C. Carty	Draft summary of status of discovery of various parties for purposes of Rule 26(f) conference in connection with prepetition transfer adversary proceeding.	1.80
03/27/20	C. Carty	Analyze issues related to document review in connection with prepetition transfer adversary proceeding.	1.30
03/27/20	C. Carty	Review and analyze key documents from document review in connection with prepetition transfer adversary proceeding and draft summary of same.	2.50
03/27/20	D. Field	Review amended complaint and interview of Scott Charles and continue document review	3.40
03/27/20	E. Plowman	Analyze documents produced in adversary proceeding.	9.60
03/27/20	G. Fromer	Review documents for relevant issues	6.10
03/27/20	H. Zimmer	Review search parameters for Blackstone subpoena	.10
03/27/20	H. Zimmer	Revise Blackstone search parameters	.10
03/27/20	H. Zimmer	Confer with Kyle Kolb, Chris Carty and Akin Gump concerning discovery production and meet and confer with Cyrus and third-parties	1.10
03/27/20	H. Zimmer	Confer with Gabrielle Fromer, Dan Field, Kyle Kolb, and Silvia Stockman on discovery review	.30



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03/27/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.10
03/27/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	2.10
03/27/20	K. Kolb	Analyze Blackstone subpoena served by opposing counsel	.10
03/27/20	K. Kolb	Revise and send proposed parameters for subpoena response to counsel for Blackstone	.20
03/27/20	K. Kolb	Revise list of meet and confer statuses	.20
03/27/20	K. Kolb	Analyze hit report from Deloitte	.30
03/27/20	K. Kolb	Revise Blackstone parameters	.30
03/27/20	K. Kolb	Supervise first level review	.30
03/27/20	K. Kolb	Analyze documents produced in adversary proceeding.	1.60
03/28/20	E. Plowman	Analyze documents produced in adversary proceeding.	3.20
03/28/20	H. Zimmer	Email Silvia Stockman, Gabrielle fromer, Dan Field, Elizabeth Plowman, Kyle Kolb, and Chris Carty concerning document review and communications with Akin Gump regarding same	.20



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03/28/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.10
03/28/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.50
03/28/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.90
03/28/20	K. Kolb	Analyze documents produced in adversary proceeding.	2.00
03/29/20	C. Carty	Review and revise summary of party and third party discovery in connection with prepetition transfer adversary proceeding.	.80
03/29/20	D. Field	Continue document review	3.00
03/29/20	E. Plowman	Analyze documents produced in adversary proceeding.	2.70
03/29/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	2.60
03/29/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	3.10



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03/29/20	H. Zimmer	Review emails between Akin and Herrick concerning document review and confer with kyle Kolb on same	.10
03/29/20	K. Kolb	Analyze documents produced by Wachtell in Rule 2004 investigation	3.00
03/30/20	C. Carty	Analyze issues raised during meet and confer with Wachtell in connection with prepetition transfer adversary proceeding.	1.00
03/30/20	C. Carty	Review and revise draft Rule 26(f) report regarding party and third party discovery status in connection with prepetition transfer adversary proceeding.	.60
03/30/20	C. Carty	Analyze issues related to document review and case strategy.	2.10
03/30/20	C. Carty	Review and analyze Wachtell letter regarding discovery in connection with prepetition transfer adversary proceeding and response thereto.	1.20
03/30/20	C. Carty	Revise proposed search parameters for Cyrus discovery in connection with prepetition transfer adversary proceeding and draft correspondence to Milbank re same.	1.90
03/30/20	C. Carty	Call with S. O'Donnell re Wachtell letter re discovery in prepetition transfer adversary proceeding.	.70



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03/30/20	C. Carty	Participate in meet and confer call with Wachtell related to third party discovery in prepetition transfer adversary proceeding.	.50
03/30/20	D. Field	Telephone conference with H. Zimmer regarding document and coding and continue document review as well as review of amended complaint and interview of Scott Charles dated 12/10/2018	4.20
03/30/20	E. Plowman	Analyze documents produced in adversary proceeding.	9.40
03/30/20	G. Fromer	Review documents for relevant issues	7.10
03/30/20	H. Zimmer	Analyze documents for relevance and code for issue and confer with Dan Field on same	.50
03/30/20	H. Zimmer	Confer Kyle Kolb, Elizabeth plowman, Silvia Stockman, Dan Field, and Gabrielle Fromer concerning document review	.20
03/30/20	H. Zimmer	Review letter from Wachtell concerning discovery and confer in-firm on same	.30
03/30/20	H. Zimmer	Conference call with Wilmer Hale and Wachtell concerning discovery	.50
03/30/20	H. Zimmer	Conference call with Akin Gump concerning discovery	.50
03/30/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.80



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03/30/20	H. Zimmer	Confer with Akin Gump on discovery review	.20
03/30/20	H. Zimmer	Email Kyle Kolb and Chris Carty concerning meet and confer with Wachtell on subpoena	.50
03/30/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.70
03/30/20	J. D'Angelo	Catch up on emails re: latest filings.	.30
03/30/20	K. Kolb	Attend meet and confer with Wachtell	.50
03/30/20	K. Kolb	Attend call with SO, CC, HZ and D. Zensky regarding strategy for meet and confer negotiations	.50
03/30/20	K. Kolb	Analyze letter from Wachtell	.30
03/30/20	K. Kolb	Revise update about meet and confer status	.20
03/30/20	K. Kolb	Attend to supervising first level review	.40
03/30/20	K. Kolb	Analyze documents produced in adversary proceeding.	3.10
03/30/20	K. Kolb	Conduct second level review of responsive review	.40
03/30/20	S. O'Donnell	Prep for Wachtell meeting; review correspondence; draft counterproposal; confer w/ akin re same; participate in Wachtell meet and confer; update call w/ akin; strategy and analysis.	3.00



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03/31/20	C. Carty	Review and analyze draft 26(f) report in connection with prepetition transfer adversary proceeding and provide comments re same.	1.80
03/31/20	C. Carty	Analyze issues related to document review and case strategy.	1.70
03/31/20	C. Carty	Meet and confer call with Girard Sharp and Robbins LLP regarding subpoenas in connection with prepetition transfer adversary proceeding.	.30
03/31/20	C. Carty	Review and analyze key documents from discovery in connection with prepetition transfer adversary proceeding and draft summary of same.	2.20
03/31/20	D. Field	Telephone conversation with K. Kolb regarding document review and further doc review based on same conversation.	4.00
03/31/20	E. Plowman	Analyze documents produced in adversary proceeding.	7.50
03/31/20	G. Fromer	Review documents for relevant issues	4.70
03/31/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.60
03/31/20	H. Zimmer	Confer with Chris Carty and Kyle Kolb concerning Deloitte Subpoena/parameters	.20



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03/31/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	.90
03/31/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags and confer in firm and with Akin concerning discovery subpoenas	1.20
03/31/20	H. Zimmer	Confer with associates concerning discovery review points	.20
03/31/20	H. Zimmer	Review and analyze documents on relativity database for relevance and code documents with relevance and issue tags	1.00
03/31/20	K. Kolb	Analyze documents produced in Rule 2004 investigation	.50
03/31/20	K. Kolb	Second level review of document review	1.50
03/31/20	K. Kolb	Analyze Deloitte hit report and draft proposed modifications	1.50
03/31/20	K. Kolb	Analyze revisions to Rule 26(f) report	.50
03/31/20	S. O'Donnell	Review 26f statement and confer w/ CC re same (.2); doc review.	.30
Total			<hr/> \$291,722.00



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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
J. D'Angelo	9.70	845.00	8,196.50
C. Carty	91.40	785.00	71,749.00
K. Kolb	72.10	610.00	43,981.00
H. Zimmer	84.80	435.00	36,888.00
D. Field	21.50	435.00	9,352.50
E. Plowman	133.80	420.00	56,196.00
G. Fromer	79.90	420.00	33,558.00
L. Schepp	57.60	335.00	19,296.00
S. O'Donnell	12.20	1025.00	12,505.00

DISBURSEMENTS

Online Research	45.09
Meals	22.48
Duplicating Supplies	9.34
Duplication	126.18
Total disbursements	\$203.09



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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
-		
	563.00	\$291,722.00
Subtotals	563.00	\$291,722.00



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

May 28, 2020
Bill Number: 355208
File Number: 19609-0002

Re: Jointly Asserted Causes of Action

Fees for legal services rendered through April 30, 2020	\$390,060.00
Expenses posted through April 30, 2020	2.88
TOTAL	\$390,062.88

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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
04/01/20	C. Carty		Review and comment on draft Rule 26(f) report.	1.60
04/01/20	C. Carty		Review and analyze key documents from discovery in prepetition transfer adversary proceeding.	2.50
04/01/20	C. Carty		Review case law cited in motions to dismiss.	.90
04/01/20	E. Plowman		Review documents for adversary proceeding.	9.60
04/01/20	H. Zimmer		Analyze documents produced for adversary proceeding and confer with Kyle Kolb on same	.10
04/01/20	H. Zimmer		Review and analyze documents produced in adversary proceeding	3.70
04/01/20	K. Kolb		Analyze documents produced for adversary proceeding.	.20
04/01/20	K. Kolb		Analyze draft Rule 26(f) report	.10
04/01/20	L. Schepp		Update documents for chronology.	.30
04/02/20	C. Carty		Analyze matters related to document review in connection with prepetition transfer adversary proceeding.	1.50
04/02/20	D. Field		Analyze and review documents produced in adversary proceeding.	2.70
04/02/20	E. Plowman		Review documents for adversary proceeding.	9.10



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04/02/20	G. Fromer	Review documents for relevant issues	1.60
04/02/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	.80
04/02/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.50
04/02/20	K. Kolb	Analyze objections from Blackstone	.30
04/02/20	K. Kolb	Analyze documents produced by Wachtell and attend to supervising review	.60
04/02/20	S. O'Donnell	Supervise approach to document review.	.50
04/03/20	C. Carty	Review and analyze discovery correspondence from Wachtell and consider response thereto.	.80
04/03/20	C. Carty	Analyze issues related to discovery disputes in connection with prepetition transfer adversary proceeding.	2.00
04/03/20	C. Carty	Review and analyze key documents from production in prepetition transfer adversary proceeding.	1.50
04/03/20	E. Plowman	Analyze and review documents produced in adversary proceeding	7.20
04/03/20	G. Fromer	Review documents for relevant issues	3.90
04/03/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	1.20



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04/03/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.90
04/03/20	K. Kolb	Review correspondence from Wachell regarding subpoena response	.20
04/03/20	K. Kolb	Supervise first level review of produced documents	.10
04/03/20	K. Kolb	Review letter regarding Sears ESI	.10
04/03/20	K. Kolb	Conduct second level review	1.60
04/03/20	S. O'Donnell	Review Wachell response; confer w/ team and akin re same; draft and serve reply.	1.00
04/04/20	E. Plowman	Analyze and review documents produced in adversary proceeding	3.40
04/04/20	H. Zimmer	Conference call with KK and CC concerning Wachtell subpoena and review email from Wachtell concerning same	.80
04/04/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.40
04/04/20	K. Kolb	Supervise first level review	.10
04/04/20	K. Kolb	Analyze key documents identified during first level review	1.50
04/04/20	K. Kolb	Call with CC and HZ regarding discovery disputes	.60
04/05/20	D. Field	Analyze and review documents produced in adversary proceeding	1.60



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04/05/20	H. Zimmer	Review correspondence between Herrick and Wachtell concerning Wachtell subpoena and discovery dispute, conduct research on privilege, and draft letter concerning discovery dispute	3.10
04/05/20	K. Kolb	Discuss discovery dispute letter with HZ	.30
04/05/20	K. Kolb	Analyze hot documents identified during first level review	1.20
04/06/20	C. Carty	Review and analyze case law related to discovery disputes in prepetition transfer adversary proceeding.	.90
04/06/20	C. Carty	Review and comment on draft brief in opposition to motion to dismiss prepetition transfer adversary proceeding.	1.50
04/06/20	C. Carty	Analyze issues related to Cyrus motion to dismiss prepetition transfer adversary proceeding.	.70
04/06/20	C. Carty	Review and analyze key documents from production in prepetition transfer adversary proceeding.	1.10
04/06/20	C. Carty	Draft email correspondence regarding discovery dispute in connection with prepetition transfer adversary proceeding.	.50
04/06/20	D. Field	Analyze and review documents produced in adversary proceeding	3.30
04/06/20	E. Plowman	Analyze and review documents produced in adversary proceeding	9.20



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04/06/20	G. Fromer	Analyze and review documents produced in adversary proceeding	5.40
04/06/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	4.00
04/06/20	H. Zimmer	Review correspondence from Wilmer Hale concerning subpoena to Blackstone and confer with Kyle Kolb and Chris Carty on Wachtell subpoena	.20
04/06/20	K. Kolb	Revise joint letter re discovery dispute	1.50
04/06/20	K. Kolb	Analyze additions to Blackstone parameters from WilmerHale	.20
04/06/20	K. Kolb	Analyze documents produced in adversary proceeding	.20
04/06/20	K. Kolb	Supervise review and analyze key documents identified during first level review	1.70
04/07/20	C. Carty	Draft letter to court regarding discovery dispute in prepetition transfer adversary proceeding and analyze research related thereto.	3.00
04/07/20	C. Carty	Analyze issues related to discovery.	1.10
04/07/20	C. Carty	Analyze issues related to Cyrus motion to dismiss prepetition transfer adversary proceeding.	.90
04/07/20	D. Field	Continue review of documents produced in adversary proceeding.	.30
04/07/20	E. Plowman	Analyze and review documents produced in adversary proceeding	9.70



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04/07/20	G. Fromer	Analyze and review documents produced in adversary proceeding	7.00
04/07/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.00
04/07/20	H. Zimmer	Review correspondence from Wachtell concerning subpoena and confer with Chris Carty and Kyle Kolb on same	.30
04/07/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.10
04/07/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	.30
04/07/20	K. Kolb	Analyze response from Wachtell	.20
04/07/20	K. Kolb	Analyze key documents identified during first level review	5.20
04/07/20	K. Kolb	Supervise first level review	.10
04/07/20	S. O'Donnell	Confer w/ team and akin re Wachtell response; coordinate discovery.	.50
04/08/20	C. Carty	Review and analyze draft Rule 26(f) report and provide comments thereto.	.80
04/08/20	C. Carty	Review and analyze motion to dismiss case law.	1.60
04/08/20	C. Carty	Review, analyze, and comment on Deloitte search terms.	.50
04/08/20	E. Plowman	Analyze and review documents produced in adversary proceeding	9.90
04/08/20	G. Fromer	Analyze and review documents produced in adversary proceeding	7.00



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04/08/20	H. Zimmer	Draft notice of intent to serve subpoena and requests to UBS	.40
04/08/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	3.70
04/08/20	H. Zimmer	Analyze correspondence with third-parties and parties concerning discovery and revise amended Rule 26(f) report and confer with KK and CC on same	.40
04/08/20	H. Zimmer	Confer with CC and Akin on service subpoena to UBS	.20
04/08/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	1.80
04/08/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	.40
04/08/20	K. Kolb	Supervise first level review	.10
04/08/20	K. Kolb	Analyze documents identified as key during first level review	2.10
04/08/20	K. Kolb	Analyze revisions to Rule 26(f) report	.30
04/08/20	K. Kolb	Analyze proposed revisions from opposing counsel to parameters for Deloitte subpoena response	.40
04/08/20	L. Schepp	Compile cases in Cyrus memorandum in support of Motion to Dismiss for attorney review, per C. Carty.	1.10
04/09/20	C. Carty	Review and analyze portions of draft opposition to motion to dismiss and related case law.	2.50



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04/09/20	C. Carty	Correspondence with document review team regarding documents produced in discovery.	.50
04/09/20	C. Carty	Review and analyze documents from privileged portion of document review.	3.20
04/09/20	C. Carty	Attention to matters related to third party discovery in connection with prepetition adversary proceeding.	.60
04/09/20	C. Carty	Review revised Rule 26(f) report.	.30
04/09/20	D. Field	Review documents produced in adversary proceeding.	1.70
04/09/20	E. Plowman	Analyze and review documents produced in adversary proceeding	8.90
04/09/20	G. Fromer	Analyze and review documents produced in adversary proceeding	7.00
04/09/20	H. Zimmer	Meet and Confer with counsel for Blackstone and Wilmer Hale concerning Blackstone subpoena and confer with Kyle Kolb on same	.60
04/09/20	H. Zimmer	Draft and revise subpoena to UBS entities, notice of intent to serve subpoena, document requests to UBS entities, conduct research on UBS entities, and review and analyze documents in adversary proceeding in connection with UBS	2.70
04/09/20	K. Kolb	Supervise first level review and discuss hot documents with review team	.70



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04/09/20	K. Kolb	Analyze key documents identified during first level review	1.80
04/09/20	K. Kolb	Prepare for and attend Blackstone meet and confer	.70
04/09/20	K. Kolb	Analyze revisions to Rule 26(f) report	.30
04/09/20	L. Schepp	Update document review strategies with case team.	.30
04/09/20	S. O'Donnell	Supervise and strategize re: approach to document review.	1.50
04/09/20	S. Stockman	Review pleadings and conduct document review.	3.70
04/10/20	C. Carty	Review and analyze updated draft opposition to motion to dismiss in connection with prepetition transfer adversary proceeding.	1.50
04/10/20	C. Carty	Review and analyze case law in connection with motion to dismiss prepetition transfer adversary proceeding and opposition thereto.	1.20
04/10/20	C. Carty	Review and analyze key documents from discovery in connection with prepetition transfer adversary proceeding.	1.80
04/10/20	D. Field	Continue review of documents produced in adversary proceeding.	2.20
04/10/20	E. Plowman	Analyze and review documents produced in adversary proceeding	3.40
04/10/20	G. Fromer	Analyze and review documents produced in adversary proceeding	2.40



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04/10/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.40
04/10/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.30
04/10/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.70
04/10/20	H. Zimmer	Confer with KK, GR, EP, DF, and SS on review of documents produced in adversary proceeding	.10
04/10/20	K. Kolb	Supervise first level review team	.50
04/10/20	K. Kolb	Analyze key documents identified during first level review	3.80
04/10/20	L. Schepp	Communication with case team and vendor regarding Relativity settings.	.80
04/10/20	S. Stockman	Analyze and review documents produced in adversary proceeding.	4.40
04/11/20	H. Zimmer	Review and analyze documents produced in adversary proceeding concerning UBS	.50
04/11/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	3.90
04/12/20	D. Field	Continue review of documents produced in adversary proceeding.	3.00
04/12/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	4.40
04/12/20	K. Kolb	Supervise first level review	.20
04/12/20	K. Kolb	Analyze key documents identified during first level review	1.00



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04/12/20	R. Ginzburg	Review motion to dismiss response issues with respect to Count 26.	.10
04/13/20	C. Carty	Meet and confer call with Milbank re discovery to Cyrus in connection with discovery in the prepetition transfer adversary proceeding.	.40
04/13/20	C. Carty	Analyze issues related to third party discovery in connection with prepetition transfer adversary proceeding.	.80
04/13/20	C. Carty	Work on opposition to Cyrus motion to dismiss prepetition adversary proceeding.	3.80
04/13/20	E. Plowman	Review and analyze documents in adversary proceeding	7.20
04/13/20	G. Fromer	Analyze and review documents produced in adversary proceeding	1.20
04/13/20	H. Zimmer	Prepare for meet and confer with counsel for the Cyrus Defendants and conduct meet and confer with counsel for the Cyrus Defendants	.70
04/13/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	3.70
04/13/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	1.00
04/13/20	K. Kolb	Supervise first level review and discuss key documents with SS	.40
04/13/20	K. Kolb	Prepare for and attend meet and confer with counsel for Cyrus	.50
04/13/20	K. Kolb	Research for opposition brief	.50



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04/13/20	K. Kolb	Analyze draft motion to dismiss opposition	1.80
04/13/20	L. Schepp	Compile list of documents related to Highly Confidential designation issue, per K. Kolb.	.80
04/13/20	R. Ginzburg	Prepare for call regarding motion to dismiss response.	.10
04/13/20	S. Stockman	Analyze and review documents produced in adversary proceeding.	3.50
04/14/20	C. Carty	Call with Akin regarding motion to dismiss briefing.	.30
04/14/20	C. Carty	Work on opposition to Cyrus motion to dismiss prepetition adversary proceeding.	3.50
04/14/20	E. Plowman	Review and analyze documents in adversary proceeding	9.70
04/14/20	G. Fromer	Analyze and review documents produced in adversary proceeding	.20
04/14/20	H. Zimmer	Confer with Kyle Kolb on Wachtell subpoena	.30
04/14/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	5.10
04/14/20	K. Kolb	Supervise first level review	.20
04/14/20	K. Kolb	Analyze Cyrus motion to dismiss in connection with opposition drafting	1.20
04/14/20	K. Kolb	Draft follow-up email to counsel for Cyrus	.40
04/14/20	K. Kolb	Analyze key documents identified during first level review	1.20



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04/14/20	S. Stockman	Analyze and review documents produced in adversary proceeding.	5.00
04/15/20	C. Carty	Call with team members regarding motion to dismiss briefing in connection with prepetition transfer adversary proceeding.	.80
04/15/20	C. Carty	Work on opposition to Cyrus motion to dismiss prepetition adversary proceeding.	2.40
04/15/20	E. Plowman	Review and analyze documents in adversary proceeding	10.20
04/15/20	G. Utlik	Confer with Chris Carty, Kyle Kolb and Rachel Ginzburg regarding response to motion to dismiss.	.20
04/15/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.60
04/15/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and confer with KK on same	.20
04/15/20	J. D'Angelo	Calls with C. Carty and K. Kolb re: opposition to Cyrus MTD; review Cyrus allegations in complaint; review Cyrus MTD; review draft arguments relating to same; begin considering response to MTD and research needed for same.	3.70
04/15/20	K. Kolb	Supervise first level review	.20
04/15/20	K. Kolb	Analyze revisions to Rule 26(f) report	.20
04/15/20	K. Kolb	Call to discuss motion to dismiss	.30



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04/15/20	K. Kolb	Analyze further drafts of motion to dismiss opposition	.80
04/15/20	R. Ginzburg	Communications with team regarding bankruptcy issues in response to motion to dismiss.	.20
04/16/20	C. Carty	Call with Richards Layton regarding scope of production in response to subpoena and draft summary of same.	.50
04/16/20	C. Carty	Participate in call with co-counsel at Akin regarding status of third party discovery and prepare for same.	1.00
04/16/20	C. Carty	Analysis and outlining related to opposition to motion to dismiss.	3.00
04/16/20	E. Plowman	Review and analyze documents in adversary proceeding.	9.70
04/16/20	G. Fromer	Analyze and review documents produced in adversary proceeding	4.40
04/16/20	H. Zimmer	Conduct research on Blackstone Custodians and review email from Ropes Gray on same	.90
04/16/20	J. D'Angelo	Review additional materials and caselaw relating to Cyrus Defendants' motion to dismiss; begin organizing brief in opposition.	2.20
04/16/20	K. Kolb	Supervise first level review	.20
04/16/20	S. O'Donnell	Review 26(F) report	.30
04/16/20	S. O'Donnell	Supervise document review progress and strategy.	.50



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04/17/20	C. Carty	Prepare for call with co-counsel and defendants' counsel regarding status of various third party discovery.	.50
04/17/20	C. Carty	Call with J. D'Angelo and K. Kolb regarding draft opposition to Cyrus motion to dismiss.	.80
04/17/20	C. Carty	Participate in call with co-counsel and defendants' counsel regarding status of various third party discovery.	1.00
04/17/20	C. Carty	Work on opposition to Cyrus motion to dismiss prepetition adversary proceeding.	3.50
04/17/20	D. Field	Continue review of documents produced in adversary proceeding.	1.70
04/17/20	E. Plowman	Research re voluntary payment doctrine for opposition to Cyrus' defendants' motion to dismiss	5.30
04/17/20	E. Plowman	Review and analyze documents in adversary proceeding	3.20
04/17/20	G. Fromer	Analyze and review documents produced in adversary proceeding	1.30
04/17/20	J. D'Angelo	Drafting opposition to Cyrus Defendants' motion to dismiss; research re: same.	6.30
04/17/20	K. Kolb	Call to discuss motion to dismiss brief with CC and JD	.80
04/17/20	K. Kolb	Email to associates regarding research assignments	.20



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04/17/20	K. Kolb	Attend call with ESL's counsel regarding status of various meet and confers	.70
04/17/20	K. Kolb	Analyze draft of opposition brief	.40
04/17/20	K. Kolb	Supervise first level review	.10
04/18/20	J. D'Angelo	Drafting opposition to Cyrus Defendants' motion to dismiss; e-mail to K. Kolb re: same.	3.60
04/18/20	K. Kolb	Supervise first level review	.10
04/18/20	K. Kolb	Analyze key documents identified during first level review	1.00
04/19/20	D. Field	Continue review of documents produced in adversary proceeding	.80
04/19/20	K. Kolb	Revise outline for brief	.70
04/19/20	K. Kolb	Analyze key documents identified during first level review	.70
04/20/20	C. Carty	Analyze potential search terms for third party discovery and draft search parameters.	1.10
04/20/20	C. Carty	Review and analyze draft opposition to motion to dismiss.	2.20
04/20/20	E. Plowman	Research re voluntary payment doctrine for opposition to Cyrus MTD	9.80
04/20/20	G. Fromer	Analyze and review documents produced in adversary proceeding	4.10
04/20/20	H. Zimmer	Review Blackstone Parameters and draft response to their proposal	.60



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04/20/20	H. Zimmer	Revise draft of search parameters for Wachtell for subpoena and confer with KK and CC concerning same	.40
04/20/20	H. Zimmer	Analyze motion to dismiss filed by Cyrus Defendants, conduct research in support of opposition to motion to dismiss, and confer with KK, CC, and JD on same	1.20
04/20/20	J. D'Angelo	Emails re: opposition to Cyrus Defendants' MTD and application of NY vs. Illinois law for unjust enrichment claim; additional research re: same.	1.90
04/20/20	K. Kolb	Revise outline for opposition brief	.30
04/20/20	K. Kolb	Analyze proposed custodians from counsel for Blackstone	.40
04/20/20	K. Kolb	Revise and transmit email to counsel for Blackstone	.10
04/20/20	K. Kolb	Supervise first level review	.10
04/20/20	K. Kolb	Review research by EP for opposition brief	.30
04/20/20	S. Stockman	Review documents produced in adversary proceeding.	5.50
04/21/20	C. Carty	Review and analyze case law related to Cyrus motion to dismiss and research related to same.	2.50
04/21/20	C. Carty	Analyze issues related to third party discovery.	.30



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04/21/20	C. Carty	Analyze search parameters for third party discovery and correspondence re same.	.50
04/21/20	E. Plowman	Research re unjust enrichment for opposition to Cyrus motion to dismiss.	7.10
04/21/20	E. Plowman	Review and analyze documents in adversary proceeding	2.80
04/21/20	G. Fromer	Analyze and review documents produced in adversary proceeding	4.00
04/21/20	H. Zimmer	Conduct research in support of opposition to motion to dismiss by Cyrus Defendants	1.60
04/21/20	H. Zimmer	Confer with KK and CC on 26(f) report	.30
04/21/20	J. D'Angelo	Review workplan for research and drafting sections of opposition brief; review research and emails from H. Zimmer and C. Carty re: same; provide guidance to associates and additional research re: same.	1.60
04/21/20	K. Kolb	Conduct additional research for opposition brief	.50
04/21/20	K. Kolb	Discuss research with EP for opposition brief	.20
04/21/20	K. Kolb	Analyze research for opposition brief by HZ	.40
04/21/20	K. Kolb	Draft motion to dismiss opposition and analyze outline	.60



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04/21/20	K. Kolb	Review research for opposition brief by EP	1.00
04/21/20	K. Kolb	Supervise first level review	.10
04/21/20	S. Stockman	Review documents produced in adversary proceeding.	1.40
04/22/20	C. Carty	Analyze issues related to Cyrus motion to dismiss and prepare opposition.	2.50
04/22/20	C. Carty	Coordinate drafting of fee application (1.0); draft summary of contested matter work for fee application (1.2).	2.20
04/22/20	C. Carty	Coordinate motion to dismiss briefing with co-counsel (0.5); review and analyze co-counsel draft briefs (1.4).	1.90
04/22/20	D. Field	Continue review of documents produced in adversary proceeding	.70
04/22/20	E. Plowman	Research for opposition to Cyrus Defendants' motion to dismiss	9.30
04/22/20	E. Plowman	Review and analyze documents in adversary proceeding	1.10
04/22/20	G. Fromer	Analyze and review documents produced in adversary proceeding	7.10
04/22/20	H. Zimmer	Conduct research and draft memorandum in opposition to motion to dismiss by Cyrus Defendants and confer with KK, CC, EP, and JD on same	2.00



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04/22/20	J. D'Angelo	Drafting opposition to Cyrus Defendants' motion to dismiss and reviewing and analyzing caselaw for same; emails re: issues relating to unjust enrichment arguments.	2.60
04/22/20	K. Kolb	Supervise first level review	.10
04/22/20	K. Kolb	Analyze and respond to research and strategy question from EP	.70
04/22/20	K. Kolb	Drafting and research for opposition brief	4.60
04/22/20	S. Stockman	Review documents produced in adversary proceeding.	1.00
04/23/20	C. Carty	Call with Herrick team regarding opposition to Cyrus motion to dismiss.	.30
04/23/20	C. Carty	Call with co-counsel at Akin regarding motion to dismiss briefing.	.30
04/23/20	C. Carty	Review, analyze, and comment on updated draft motion to dismiss related to fraudulent transfer and unjust enrichment claims.	3.10
04/23/20	E. Plowman	Call with Akin/Herrick attorneys re opposition to motions to dismiss	.50
04/23/20	E. Plowman	Research for opposition to Cyrus defendants' motion to dismiss	6.20
04/23/20	E. Plowman	Draft portions of opposition to Cyrus Defendants' motion to dismiss.	3.40
04/23/20	G. Fromer	Analyze and review documents produced in adversary proceeding	4.20



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04/23/20	H. Zimmer	Confer with KK, CC, EP, and JD on opposition to motion to dismiss by Cyrus Defendants	.30
04/23/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	4.00
04/23/20	H. Zimmer	Conduct research and draft memorandum of law in support of opposition for motion to dismiss against Cyrus Defendants and confer with KK on same	2.10
04/23/20	H. Zimmer	Conduct research and draft memorandum in support of opposition to motion to dismiss by Cyrus Defendants and confer with KK on same	1.50
04/23/20	J. D'Angelo	Prepare for and participate in pre-conference call with team and conference call with Akin re: opposition to Cyrus Defendants' motion to dismiss; emails re: same; review new drafts of Akin briefs relating to ESL defendants' (and others) motions to dismiss; consider same for opposition to Cyrus Defendants' motion to dismiss; review decision from Judge Drain re: additional pages for opposition briefs, e-mail re: same.	2.20
04/23/20	K. Kolb	Discuss research and strategy for brief with CC, JD, EP, and Akin team	.50
04/23/20	K. Kolb	Revise and related research for motion to dismiss opposition	5.90



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04/23/20	K. Kolb	Supervise first level review and answer related questions	.30
04/23/20	S. O'Donnell	Review motions to dismiss.	2.00
04/23/20	S. Stockman	Review documents produced in adversary proceedings.	1.50
04/24/20	C. Carty	Review, analyze, and comment on updated draft opposition to motion to dismiss related to fraudulent transfer and unjust enrichment claims.	2.50
04/24/20	C. Carty	Draft portions of opposition to Cyrus motion to dismiss and research related to same.	4.20
04/24/20	E. Plowman	Review and analyze documents in adversary proceeding	7.20
04/24/20	G. Fromer	Analyze and review documents produced in adversary proceeding	3.80
04/24/20	G. Utlik	Analyze draft opposition brief to motion to dismiss by Cyrus Defendants.	.80
04/24/20	H. Zimmer	Confer with KK, JD, KK, and EP on memorandum in opposition to motion to dismiss by Cyrus Defendants	.10
04/24/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and confer with KK and DF on same	3.70



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04/24/20	H. Zimmer	Analyze emails from Deloitte's counsel on subpoena and confer with KK and CC on same and review copy of 26(f) report	.20
04/24/20	J. D'Angelo	Review latest draft of Opposition to Cyrus Defendants' MTD; emails re: same; revisions to same; review certain cases cited therein.	4.30
04/24/20	K. Kolb	Further revisions to motion to dismiss opposition	2.30
04/24/20	K. Kolb	Supervise first level review	.30
04/24/20	S. Stockman	Review documents produced in adversary proceeding.	2.20
04/25/20	C. Carty	Draft portions of opposition to Cyrus motion to dismiss and research related to same.	2.10
04/25/20	C. Carty	Review and revise draft opposition to Cyrus Defendants' motion to dismiss.	3.80
04/25/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.80
04/25/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	3.40
04/25/20	H. Zimmer	Prepare materials and questions for meet and confer with Blackstone on subpoena	.20
04/25/20	K. Kolb	Analyze drafts of other oppositions to motions to dismiss	2.50
04/25/20	K. Kolb	Analyze analysis of case citations in opposition brief	.60



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04/26/20	C. Carty	Review and revise draft opposition to Cyrus Defendants' motion to dismiss.	4.30
04/26/20	C. Carty	Review and analyze research related to opposition to Cyrus Defendants' motion to dismiss.	2.50
04/26/20	E. Plowman	Review and analyze documents in adversary proceeding	2.30
04/26/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	8.00
04/26/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.00
04/26/20	J. D'Angelo	Review and analyze latest version of Opposition to Cyrus Defendants' motion to dismiss; emails re: same; compare new arguments to arguments opposing ESL brief.	1.60
04/26/20	K. Kolb	Revise opposition brief	1.50
04/26/20	K. Kolb	Analyze cases relied upon in brief	1.40
04/26/20	S. O'Donnell	Diligence for MTD review.	2.00
04/27/20	C. Carty	Review and revise draft opposition to Cyrus Defendants' motion to dismiss.	4.40
04/27/20	E. Plowman	Review and analyze documents in adversary proceeding	5.20
04/27/20	G. Fromer	Analyze and review documents produced in adversary proceeding	3.70
04/27/20	H. Zimmer	Confer with Kyle Kolb and Chris Carty on Blackstone call and review materials to prep for call	.30



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04/27/20	H. Zimmer	Meet and Confer with Kyle Kolb, Blackstone's counsel and Wilmer Hale on Blackstone subpoena, and confer with Kyle Kolb on same	.70
04/27/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	1.40
04/27/20	J. D'Angelo	Further review/analysis of draft opposition brief and confer with team re: edits and e-mail re: alternative case cites.	1.80
04/27/20	K. Kolb	Supervise first level review	.10
04/27/20	K. Kolb	Review cases relied upon in opposition brief	4.10
04/27/20	S. O'Donnell	Prepare for MTD opposition.	.50
04/27/20	S. Stockman	Review documents produced in adversary proceedings.	1.90
04/28/20	D. Field	Review documents produced in adversary proceeding	2.90
04/28/20	E. Plowman	Research for opposition to Cyrus motion to dismiss.	10.20
04/28/20	G. Fromer	Analyze and review documents produced in adversary proceeding	3.10
04/28/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	.30
04/28/20	H. Zimmer	Review opposition to motion to dismiss for caselaw and conduct research on same	2.90
04/28/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and confer with Kyle Kolb on same	4.00



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04/28/20	J. D'Angelo	Emails re: new caselaw for brief in opposition to Cyrus Defendants' motion to dismiss; review new caselaw and proposed replacement cases; confer with team re: same and notifying Akin of replacing certain cases also cited in brief opposing ESL Defendants' motion; review/edit latest draft of opposition to Cyrus Defendants' motion to dismiss.	2.70
04/28/20	K. Kolb	Analyze and discuss document review next steps with CC	.40
04/28/20	K. Kolb	Analyze opinions relied upon in opposition brief	3.70
04/28/20	K. Kolb	Further revisions to opposition brief	.90
04/28/20	K. Kolb	Analyze documents produced in Rule 2004 investigation	.60
04/28/20	K. Kolb	Analyze review issues and draft second level plan	.60
04/28/20	S. Stockman	Review documents produced in adversary proceeding.	1.60
04/29/20	C. Carty	Review and revise draft opposition to Cyrus Defendants' motion to dismiss.	6.50
04/29/20	C. Carty	Revise search terms for third party discovery.	.50
04/29/20	C. Carty	Review and comment on portions of co-counsel Brief II concerning claims against Cyrus Defendants.	2.50



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04/29/20	C. Carty	Review and analyze case law related to motions to dismiss.	2.50
04/29/20	E. Plowman	Review and analyze documents in adversary proceeding	2.40
04/29/20	E. Plowman	Review unsecured creditor committees' briefs in opposition to defendants' motions to dismiss	4.10
04/29/20	G. Fromer	Analyze and review documents produced in adversary proceeding	.60
04/29/20	G. Utlik	Follow up with Kyle Kolb regarding draft opposition to Cyrus' motion to dismiss.	.30
04/29/20	H. Zimmer	Confer with Kyle Kolb and Chris Carty on documents produced in adversary proceeding	.20
04/29/20	H. Zimmer	Confer with Elizabeth Plowman, Kyle Kolb, and Silvia Stockman on review of documents produced adversary proceeding	.10
04/29/20	H. Zimmer	Revise subpoena to third-party, UBS, and confer with Chris Carty and Doug Kopf on same	.90
04/29/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	3.00
04/29/20	H. Zimmer	Revise memorandum of law in opposition to dismiss by Cyrus Defendants and confer with KK, CC, and JD on same	2.30



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04/29/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and confer with Kyle Kolb, Chris Carty, and Linda Schepp on same	5.40
04/29/20	J. D'Angelo	Work on draft opposition to Cyrus Defendants' motion to dismiss and review latest drafts of opposition to ESL motion to dismiss; emails re: strategy and coordination for both opposition briefs; updated caselaw and edits from S. O'Donnell.	4.40
04/29/20	K. Kolb	Further discussion of revisions to opposition brief with HZ	.30
04/29/20	K. Kolb	Analyze and incorporate cite check results	.40
04/29/20	K. Kolb	Draft email to co-counsel regarding preferred case law	.50
04/29/20	K. Kolb	Draft and analyze strategy for second level review and chronology	.70
04/29/20	K. Kolb	Analyze edits from co-counsel to brief	.60
04/29/20	K. Kolb	Analyze comments from GU on opposition brief	.30
04/29/20	L. Schepp	Crafting searches and draft indexes for attorney use in second level issue review in the H5 Relativity workspace.	3.60
04/29/20	S. O'Donnell	Revise opposition brief.	2.50



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04/30/20	C. Carty	Review and comment on portions of co-counsel Brief II concerning claims against Cyrus Defendants.	1.70
04/30/20	C. Carty	Revise and finalize opposition to Cyrus Defendants' motion to dismiss.	7.50
04/30/20	D. Field	Continue review of documents produced in adversary proceeding	2.70
04/30/20	E. Plowman	Review oppositions to motions to dismiss	3.10
04/30/20	G. Fromer	Analyze and review documents produced in adversary proceeding	3.60
04/30/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and confer with Kyle Kolb, Chris Carty, Gabrielle Fromer, and Silvia Stockman on same	4.00
04/30/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and confer	3.70
04/30/20	H. Zimmer	Revise memorandum of law in opposition to motion to dismiss by Cyrus Defendants and confer with Chris Carty, Kyle Kolb on same	1.30
04/30/20	H. Zimmer	Confer with Chris Carty, Kyle Kolb on opposition to motion to dismiss by Cyrus Defendants	.20
04/30/20	H. Zimmer	Revise memorandum of law in opposition to motion to dismiss by Cyrus Defendants and confer with Chris Carty, Kyle Kolb on same	1.20



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04/30/20	H. Zimmer	Review correspondence from Blackstone's counsel concerning subpoena and confer with KK on same	.30
04/30/20	J. D'Angelo	Review /edit latest drafts of brief in opposition to Cyrus Defendants' motion to dismiss; emails re: same; emails re: related briefs and declarations/exhibits; review Akin drafts for opposition to ESL Defendants' motion to dismiss; numerous emails throughout the day re: finalizing briefs.	3.00
04/30/20	K. Kolb	Analyze proposal from counsel for Blackstone	.20
04/30/20	K. Kolb	Further revisions to motion to dismiss	1.90
04/30/20	L. Schepp	Craft Relativity searches for issue tags for attorney review.	1.40
04/30/20	S. O'Donnell	Revise opposition brief.	2.50
Total			\$390,060.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
J. D'Angelo	41.90	845.00	35,405.50
C. Carty	119.20	785.00	93,572.00
G. Utlik	1.30	625.00	812.50
K. Kolb	80.50	610.00	49,105.00



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<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
S. Stockman	31.70	435.00	13,789.50
D. Field	23.60	435.00	10,266.00
R. Ginzburg	.40	435.00	174.00
H. Zimmer	134.00	435.00	58,290.00
E. Plowman	190.40	420.00	79,968.00
G. Fromer	75.60	420.00	31,752.00
L. Schepp	8.30	335.00	2,780.50
S. O'Donnell	13.80	1025.00	14,145.00

DISBURSEMENTS

Duplication	2.88
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Total disbursements	<hr/> \$2.88
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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
-		
	720.70	\$390,060.00
Subtotals	720.70	\$390,060.00



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

June 30, 2020
Bill Number: 356200
File Number: 19609-0002

Re: Jointly Asserted Causes of Action

Fees for legal services rendered through May 31, 2020	\$188,867.50
Expenses posted through May 31, 2020	993.13
TOTAL	\$189,860.63

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
03/08/20	E. Plowman		Review and analyze documents in adversary proceeding.	1.10
05/01/20	C. Carty		Call with document review team regarding status of document review and next steps.	.90
05/01/20	C. Carty		Analyze issues related to document review.	1.50
05/01/20	C. Carty		Draft update regarding third party discovery.	.80
05/01/20	C. Carty		Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	1.30
05/01/20	D. Field		Strategy call concerning document review	1.00
05/01/20	D. Field		Continue review of documents produced in adversary proceedings	3.00
05/01/20	E. Plowman		Call re review of documents in adversary proceeding	1.00
05/01/20	E. Plowman		Review and analysis of documents in adversary proceeding	6.40
05/01/20	G. Fromer		Review documents marked as hot during first level review to prepare to discuss findings during first level review	1.50



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05/01/20	G. Fromer	Discuss findings of first level document review and discuss next steps for drafting summaries of documents of interest	1.00
05/01/20	G. Fromer	Review Plaintiff's Opposition Briefs to Motion to Dismiss and Paul Weiss Interview of Scott Charles for factual issues relating to Lands End and Seritage	2.50
05/01/20	H. Zimmer	Draft email to Blackstone counsel concerning subpoena and confer with KK and Linda Schepp on same	.50
05/01/20	H. Zimmer	Review materials in preparation for call concerning document review in adversary proceeding	.30
05/01/20	H. Zimmer	Conference call on review of documents produced in adversary proceeding	1.00
05/01/20	H. Zimmer	Confer on review of documents produced in adversary proceeding	.80
05/01/20	J. D'Angelo	Catch up on e-mail re: latest filings; review final version of Opposition to ESL Defendants' motion to dismiss.	1.30
05/01/20	K. Kolb	Review team call to discuss further work product and review streams	.90
05/01/20	K. Kolb	Analyze further Blackstone's custodian proposal	.20
05/01/20	K. Kolb	Draft email to counsel for ESL regarding Blackstone parameters	.20



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05/01/20	K. Kolb	Analyze custodian metrics from LS for Blackstone subpoena	.50
05/01/20	K. Kolb	Draft review plan for second level review	.40
05/01/20	L. Schepp	Revise hot document issue searches for attorney reviews.	5.20
05/01/20	L. Schepp	Discussion with team regarding document review protocol.	.20
05/01/20	L. Schepp	Revise document review protocol based on team input.	1.40
05/01/20	L. Schepp	Compile additional Blackstone related emails for attorney review	1.70
05/01/20	S. Stockman	Strategize document review and coordination of topical review.	.90
05/03/20	D. Field	Review documents produced in adversary proceeding	.70
05/03/20	K. Kolb	Analyze documents requiring further review	1.00
05/04/20	D. Field	Continue review of documents produced in adversary proceeding	2.60
05/04/20	E. Plowman	Review and analyze documents in adversary proceeding	8.10
05/04/20	H. Zimmer	Confer with Kyle Kolb and Chris Carty concerning subpoena on Richards Layton	.20
05/04/20	H. Zimmer	Confer with Kyle Kolb and Wilmer Hale concerning Blackstone subpoena	.10
05/04/20	K. Kolb	Analyze recent production from Sears's Delaware counsel	.20



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05/04/20	K. Kolb	Review opposition briefs	1.40
05/04/20	L. Schepp	Revise hot docs searches to reduce duplicates in documents for review.	5.10
05/05/20	C. Carty	Correspondence related to third party discovery in connection with prepetition transfer adversary proceeding.	.50
05/05/20	C. Carty	Review and comment on task list.	.40
05/05/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	2.50
05/05/20	D. Field	Continue review of documents produced in adversary proceeding	1.10
05/05/20	E. Plowman	Review and analyze documents in adversary proceeding	7.80
05/05/20	G. Fromer	Discuss strategy for reviewing and summarizing documents of interest	.10
05/05/20	H. Zimmer	Analyze requests for production from Cascade and Cyrus Defendants and proposed search parameters, revise proposed search parameters to Cyrus and confer with Kyle Kolb and Chris Carty on same	1.30
05/05/20	H. Zimmer	Revise discovery table and confer with Kyle Kolb and Chris Carty on same	.30



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05/05/20	H. Zimmer	Confer with Kyle Kolb, Jason D'Angelo, and Chris Carty on status of defendant and third-party discovery and revise memorandum on open items	1.10
05/05/20	H. Zimmer	Review documents produced in adversary proceeding and confer with Kyle Kolb and Gabrielle Fromer on same	1.00
05/05/20	H. Zimmer	Confer with Chris Carty on deloitte subpoena	.10
05/05/20	H. Zimmer	Confer with Gabrielle Fromer on memorandum concerning evaluation of claims	.20
05/05/20	J. D'Angelo	E-mail re: team task list; review same.	.20
05/05/20	K. Kolb	Analyze opposition briefs	1.00
05/05/20	K. Kolb	Revise discovery tracking chart	.20
05/05/20	K. Kolb	Revise task list	.40
05/05/20	K. Kolb	Respond to queries regarding second level review	.50
05/05/20	S. O'Donnell	Document review.	1.00
05/06/20	C. Carty	Analyze issues related to document review in connection with prepetition transfer adversary proceeding.	1.20
05/06/20	D. Field	Review project task list and upcoming deadlines	.10
05/06/20	E. Plowman	Review and analyze documents in adversary proceeding	5.10



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05/06/20	H. Zimmer	Confer with Chris Carty on review of documents produced in adversary proceeding	.40
05/06/20	H. Zimmer	Review documents produced in adversary proceeding and confer with Kyle Kolb and Gabrielle Fromer on same	.40
05/06/20	J. D'Angelo	Review team task list and emails re: same.	.30
05/06/20	K. Kolb	Revise task list	.10
05/06/20	L. Schepp	Compile update key names list for attorney review.	1.40
05/06/20	L. Schepp	Compile Deloitte names for attorney review.	.70
05/06/20	S. O'Donnell	Review task list regarding status of case.	.20
05/07/20	C. Carty	Analyze proposed search terms to Cyrus for discovery related to prepetition transfer adversary proceeding.	.80
05/07/20	C. Carty	Draft correspondence to recipient of third party subpoena in connection with prepetition transfer adversary proceeding.	.90
05/07/20	E. Plowman	Review and analyze documents in adversary proceeding	5.60
05/07/20	G. Fromer	Summarize documents of interest regarding Seritage	.50
05/07/20	G. Fromer	Summarize documents of interest regarding Lands End Spinoff	2.90



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05/07/20	H. Zimmer	Confer with Gabrielle Fromer and Linda Schepp on review of documents produced in adversary proceeding and outstanding assignments	.30
05/07/20	H. Zimmer	Revise proposed parameters to Cyrus and draft email to Cyrus and confer with Chris Carty and Kyle Kolb on same	.80
05/07/20	H. Zimmer	Review email to Aronstam concerning subpoena	.20
05/07/20	H. Zimmer	Confer with Kyle Kolb on third-party discovery	.10
05/07/20	K. Kolb	Draft email to counsel for Blackstone regarding subpoena parameters	.10
05/07/20	K. Kolb	Revise email to Aronstam	.20
05/07/20	L. Schepp	Update Relativity searches for attorney review.	2.30
05/08/20	C. Carty	Review and revise draft interim fee application.	4.50
05/08/20	C. Carty	Attention to issues related to third party discovery.	1.10
05/08/20	E. Plowman	Review and analyze documents in adversary proceeding	2.10
05/08/20	G. Fromer	Summarize documents of interest regarding Seritage	3.10
05/08/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries for same	2.60



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05/08/20	H. Zimmer	Revise proposed search parameters to cyrus defendants and confer with Chris Carty and Kyle Kolb on same and third-party discovery	1.20
05/08/20	H. Zimmer	Confer with Kyle Kolb and Chris Carty concerning third-party discovery subpoenas and discovery on Cyrus Defendants and draft document compiling same	.70
05/08/20	K. Kolb	Analyze proposal to counsel to Cyrus	.20
05/08/20	K. Kolb	Call with LS to discuss gathering prior filings	.40
05/08/20	L. Schepp	Compile Cyrus ECF filings for attorney review.	4.80
05/09/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries for same	5.80
05/09/20	K. Kolb	Analyze oppositions to motion to dismiss	.80
05/10/20	C. Carty	Review and revise draft interim fee application.	2.80
05/10/20	E. Plowman	Review and analyze documents in adversary proceeding.	1.60
05/10/20	H. Zimmer	Revise and finalize UBS subpoena, document requests, and notice of intent and confer with Chris Carty on same	1.00
05/10/20	H. Zimmer	Revise UBS subpoena and confer with Chris Carty on same	.70



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05/11/20	C. Carty	Review third party subpoena prior to service.	.40
05/11/20	C. Carty	Analyze issues related to third party document requests in connection with prepetition transfer adversary proceeding.	.50
05/11/20	C. Carty	Review and revise draft interim fee application.	7.50
05/11/20	D. Kopf	Arrange for Service of third-party subpoena on UBS Securities.	.30
05/11/20	E. Plowman	Review and analyze documents in adversary proceeding.	2.10
05/11/20	G. Fromer	Summarize and tag documents of interest relating to Seritage transaction	4.30
05/11/20	H. Zimmer	Finalize Notice of intent to serve subpoena on UBS and UBS subpoena and send same to counsel in Sears and Doug Kopf for service and confer with Chris Carty on same	.80
05/11/20	H. Zimmer	Draft email to Cyrus' counsel and send proposed parameters to Cyrus counsel and confer with Chris Carty on same	.30
05/11/20	H. Zimmer	Confer with Chris Carty and Kyle Kolb on proposed parameters to Cyrus	.30
05/11/20	H. Zimmer	Review documents produced in adversary proceeding in connection with Wachtell subpoena and confer with Chris Carty on same	.70



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05/11/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries for same	3.90
05/11/20	K. Kolb	Revise summary of Lands End documents	.60
05/11/20	L. Schepp	Compile related Cyrus ECF filings for attorney review.	3.00
05/11/20	L. Schepp	Update document production index.	.60
05/12/20	C. Carty	Review and revise draft interim fee application.	4.50
05/12/20	C. Carty	Correspondence re third party discovery.	.50
05/12/20	C. Carty	Correspondence re document review.	.20
05/12/20	C. Carty	Call with H. Zimmer re certain third party discovery.	.20
05/12/20	G. Fromer	Summarize and tag documents of interest relating to Seritage transaction	2.30
05/12/20	H. Zimmer	Analyze responses and objections from Girard Sharp and Robbins LLP on subpoenas and confer with Chris Carty on same	.20
05/12/20	H. Zimmer	Revise memorandum on ongoing discovery and research related tasks and confer with KK on same	.20
05/12/20	H. Zimmer	Revise discovery chart for conference and confer with Akin on same	.20



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05/12/20	H. Zimmer	Confer with Akin on subpoenas to third parties	.10
05/12/20	K. Kolb	Revise discovery status	.20
05/13/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	3.50
05/13/20	G. Fromer	Summarize and tag documents of interest relating to Seritage transaction	5.30
05/13/20	G. Fromer	Summarize and tag documents of interest relating to Seritage derivative litigation	1.10
05/13/20	G. Fromer	Conduct legal research on applicable statute of limitations to claim of aiding and abetting breach of fiduciary duty	1.00
05/13/20	H. Zimmer	Confer with KK on Blackstone subpoena, confer with EP on outstanding deadlines concerning discovery and filings, and confer with KK, DF, SS, GF, and EP on outstanding assignments	.30
05/13/20	H. Zimmer	Confer with Gabrielle Fromer, Kyle Kolb, and Silvia Stockman on review of documents produced in adversary proceeding and summaries incorporating information from same	.20



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05/13/20	H. Zimmer	Confer with Gabrielle Fromer on research for statute of limitations and choice of law in connection claims asserted in the complaint and review research on same	.30
05/13/20	H. Zimmer	Review email from Blackstone and confer with KK on status of blackstone production, discovery, and court conference	.20
05/13/20	J. D'Angelo	Review team task list.	.10
05/13/20	K. Kolb	Draft email to counsel for Blackstone	.20
05/13/20	K. Kolb	Discuss research with H. Zimmer	.10
05/13/20	L. Schepp	Compile additional Cyrus ECF filings, per K. Kolb.	4.70
05/14/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	3.80
05/14/20	C. Carty	Correspond with co-counsel re case budget.	.40
05/14/20	C. Carty	Finalize and file interim fee application.	.70
05/14/20	C. Carty	Call with recipient of third party subpoena re subpoena.	.30
05/14/20	D. Field	Continue review of documents produced in adversary proceeding	.20



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05/14/20	H. Zimmer	Meet and confer with Ross Aronstam and Wilmer Hale concerning Ross Aronstam subpoena and confer with Kyle Kolb and Chris Carty on same	.50
05/14/20	H. Zimmer	Confer with Dan Field on review of documents produced in adversary proceeding and summaries on same	.20
05/14/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	2.00
05/14/20	H. Zimmer	Email Gabrielle Fromer research regarding claims analysis on statute of limitations for fraud and negligent representation.	.30
05/14/20	K. Kolb	Conference call with Aronstam regarding subpoena	.30
05/15/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	2.50
05/15/20	D. Field	Continue review of documents produced in adversary proceeding	1.20
05/15/20	G. Fromer	Research statute of limitations and choice of law for potential claims and revise memorandum on potential claims	2.50
05/15/20	G. Fromer	Discuss choice of law analysis for research on potential claims	.20
05/15/20	H. Zimmer	Review email from Wachtell concerning subpoena	.10



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05/15/20	H. Zimmer	Confer with Gabrielle Fromer regarding claims analysis research	.20
05/15/20	H. Zimmer	Confer with Elizabeth Plowman and Kyle Kolb on discovery deadlines	.10
05/16/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	3.60
05/17/20	D. Field	Review documents produced in adversary proceeding	1.10
05/18/20	C. Carty	Analyze issues related to third party discovery in connection with prepetition litigation adversary proceeding (1.1); correspondence re same (0.3).	1.40
05/18/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	2.20
05/18/20	D. Field	Review documents produced in adversary proceeding	4.00
05/18/20	E. Plowman	Review and analyze documents in adversary proceeding	3.00
05/18/20	G. Fromer	Research regarding claims analysis.	4.60
05/18/20	H. Zimmer	Call with GF to discuss research on claims	.10
05/18/20	H. Zimmer	Confer with KK on Richards Layton document production	.10



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05/18/20	H. Zimmer	Review email from Wachtell concerning subpoena and confer with KK and CC on Richards Layton subpoena	.10
05/19/20	C. Carty	Call with K. Kolb and H. Zimmer re review of third party document production in connection with prepetition transfer adversary proceeding.	.30
05/19/20	E. Plowman	Review and analyze documents in adversary proceeding	1.30
05/19/20	G. Fromer	Research and revise memorandum on potential claims	2.80
05/19/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	2.00
05/19/20	H. Zimmer	Confer with KK and CC on documents produced by Richards Layton and review materials from Richards Layton	.40
05/19/20	H. Zimmer	Revise memorandum on discovery conducted by Herrick and send same to Dean Chapman	.30
05/19/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	2.80
05/19/20	H. Zimmer	Analyze memorandum of law submitted in support of opposition to motion to dismiss	.40



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05/19/20	J. D'Angelo	Catch up on e-mail; review letter and response to same regarding discovery issues; review recent order and e-mail re: pretrial conference.	.70
05/19/20	L. Schepp	Update index of H5 Relativity workspace to identify location of potentially relevant documents for review.	3.70
05/20/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	2.80
05/20/20	D. Field	Review documents produced in adversary proceeding	.20
05/20/20	E. Plowman	Review and analyze documents in adversary proceeding	3.80
05/20/20	G. Fromer	Research and revise memorandum on potential claims	1.60
05/20/20	G. Fromer	Discuss choice of law analysis of claims research	.30
05/20/20	G. Fromer	Review Plaintiffs' Brief in Opposition to Motion to Dismiss Plaintiffs' Breach of Fiduciary Duty, Aiding & Abetting Breach of Fiduciary Duty and Illegal Dividend claims, and revise facts section of potential claims memo, and draft key players list	1.90



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05/20/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and confer with Linda Schepp on same	5.40
05/20/20	H. Zimmer	Review memorandum on research concerning claims from Gabrielle Fromer, confer with her on same, and conduct research on claims brought in complaint	.60
05/20/20	H. Zimmer	Revise memorandum on ongoing assignments and discovery with third-parties and confer with KK on same	.30
05/20/20	H. Zimmer	Review docket and our papers to see what to be sent to CC and SO for conference and confer with KK	.50
05/20/20	J. D'Angelo	Review emails from co-counsel and counsel for ESL/Lampert re: discovery issues; review task list.	.40
05/20/20	K. Kolb	Discuss research status with HZ	.20
05/20/20	L. Schepp	Review metadata in Relativity H5 workspace in preparation for attorney document relevance review.	1.70
05/20/20	L. Schepp	Compile various custodian information from Relativity H5 workspace in preparation for attorneys document relevance review.	.90



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05/21/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	1.50
05/21/20	D. Field	Review documents produced in adversary proceeding	4.40
05/21/20	E. Plowman	Review and analyze documents in adversary proceeding	1.00
05/21/20	G. Fromer	Review Plaintiffs' Brief in Opposition to Motion to Dismiss Plaintiffs' Breach of Fiduciary Duty, Aiding & Abetting Breach of Fiduciary Duty and Illegal Dividend claims, and revise facts section of potential claims memo	5.50
05/21/20	H. Zimmer	Confer with KK and CC on pre-trial conference	.10
05/21/20	H. Zimmer	Conduct research in response to objections from Robbins and Girard	1.30
05/21/20	H. Zimmer	Confer with Gabrielle Fromer on research for assertion of claims and review of documents produced in adversary proceeding	.10
05/21/20	H. Zimmer	Confer with LS on doc review	.30
05/21/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and confer with Linda Schepp on same	2.00
05/21/20	H. Zimmer	Confer with counsel for Blackstone concerning document production in response to subpoena	.10



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05/21/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	4.80
05/21/20	K. Kolb	Discuss RLF review with H. Zimmer and L. Schepp	.20
05/21/20	L. Schepp	Discussions with H5 vendor regarding threading and creating chronology sets for attorney review	2.80
05/21/20	L. Schepp	Work with H. Zimmer on structuring searches for review	2.00
05/21/20	S. O'Donnell	Review discovery correspondence.	.20
05/22/20	C. Carty	Analyze issues related to third party discovery in connection with prepetition transfer adversary proceeding.	.60
05/22/20	C. Carty	Review and analyze letter from co-counsel to defendants in connection with meet and confer in prepetition transfer adversary proceeding.	.70
05/22/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	2.50
05/22/20	E. Plowman	Review and analyze documents in adversary proceeding	.90
05/22/20	G. Fromer	Review Plaintiffs' Briefs in Opposition to Motion to Dismiss, and revise facts section of potential claims memo	2.40
05/22/20	G. Fromer	Discuss choice of law analysis	.20
05/22/20	H. Zimmer	Confer with GF on legal research analyzing claims	.30



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05/22/20	H. Zimmer	Review emails from UBS concerning subpoena, email UBS in response, and confer with Chris Carty on same	.30
05/22/20	H. Zimmer	Review and analyze documents produced in adversary proceeding	5.40
05/22/20	H. Zimmer	Review letter to Judge Drain filed by Akin Gump and confer with Kyle Kolb on same	.20
05/22/20	H. Zimmer	Review email from Blackstone's counsel concerning subpoena and meet and confer	.10
05/22/20	J. D'Angelo	Review letter to Judge Drain re: e-briefs.	.20
05/23/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	5.10
05/24/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	2.20
05/25/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	2.50
05/26/20	C. Carty	Participate in discovery meet and confer in connection with prepetition transfer causes of action and prepare for same.	1.00



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05/26/20	C. Carty	Correspondence related to legal analysis in prepetition transfer adversary proceeding.	.50
05/26/20	C. Carty	Analyze issues related to third party discovery in connection with prepetition transfer adversary proceeding.	.50
05/26/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	2.40
05/26/20	D. Field	Review documents produced in adversary proceeding	1.90
05/26/20	G. Fromer	Review Plaintiffs' Briefs in Opposition to Motion to Dismiss, and revise facts section of potential claims memo	3.00
05/26/20	H. Zimmer	Revise discovery chart and confer with Chris Carty, Kyle Kolb, and Dean Chapman concerning same	.30
05/26/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	2.10
05/26/20	H. Zimmer	Confer with Chris Carty concerning status conference	.10
05/26/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	5.80
05/26/20	H. Zimmer	Review UBS' responses and objections to subpoena	.20



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05/26/20	H. Zimmer	Review opposition briefs submitted by Plaintiffs for arguments concerning release and derivative litigation and review document summaries concerning derivative litigation	.40
05/26/20	J. D'Angelo	Review draft protective order; review document review status relating to Wachtell production; catch up on emails and filings.	1.10
05/26/20	K. Kolb	Revise summary of key documents regarding Seritage transaction	1.50
05/26/20	L. Schepp	Work with H. Zimmer regarding email threading for review of RL&F documents.	1.40
05/27/20	C. Carty	Analyze issues related to third party discovery.	1.30
05/27/20	C. Carty	Call with recipient of third party discovery re objections and scope of subpoena (0.3); prepare for same (0.4); review and analyze responses and objections to subpoena (0.6).	1.30
05/27/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	1.90
05/27/20	D. Field	Review documents produced in adversary proceeding	1.00
05/27/20	G. Fromer	Review Plaintiffs' Briefs in Opposition to Motion to Dismiss, and revise facts section of potential claims memo	2.80



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05/27/20	G. Fromer	Review Amended Complaint, and revise facts section of potential claims memo	1.10
05/27/20	H. Zimmer	Review objections and materials for UBS and call with Chris Carty to discuss same and UBS subpoena	.70
05/27/20	H. Zimmer	Call with UBS and confer with Chris Carty on same	.60
05/27/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and confer with Chris Carty and Kyle Kolb on documents produced by Richards Layton	1.10
05/27/20	H. Zimmer	Review search parameters and communications with Blackstone in anticipation with call concerning subpoena and conduct call with Blackstone and Wilmer Hale concerning Blackstone subpoena and confer with KK on same	.70
05/27/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and document summaries and confer with KK on same	1.40
05/27/20	H. Zimmer	Task list and confer with KK and CC about third-party discovery	.30
05/27/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	3.20



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05/27/20	J. D'Angelo	Review letter to Defendants re: discovery issues; review team task list.	.20
05/27/20	K. Kolb	Prepare for and attend meet and confer with counsel for Blackstone	.50
05/27/20	K. Kolb	Analyze letter regarding meet and confer	.10
05/27/20	K. Kolb	Analyze task list status	.10
05/27/20	K. Kolb	Analyze and discuss key documents relating to Seritage transaction	.50
05/28/20	C. Carty	Review and analyze documents produced in connection with prepetition transfer adversary proceeding.	1.60
05/28/20	C. Carty	Correspondence re status of certain third party discovery.	.50
05/28/20	E. Plowman	Review and analyze documents in adversary proceeding	1.20
05/28/20	H. Zimmer	Confer with KK and CC on third- party discovery	.20
05/28/20	H. Zimmer	Email counsel for Cyrus concerning document requests and production in response to same	.10
05/28/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same and confer with LS and KK on same	5.20
05/28/20	K. Kolb	Discuss discovery issues and status with C. Carty and H. Zimmer	.30



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05/28/20	S. O'Donnell	Confer w/ akin re production; confer w/ team re same.	.20
05/29/20	C. Carty	Revise correspondence to recipient of third party subpoena.	.30
05/29/20	E. Plowman	Review and analyze documents in adversary proceeding	5.50
05/29/20	G. Fromer	Review Amended Complaint, and revise facts section of potential claims memo	3.00
05/29/20	H. Zimmer	E-mail Wachtell concerning progress on production in response to Wachtell subpoena	.10
05/29/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	6.50
05/29/20	S. O'Donnell	Doc review; prep for ptc.	1.50
05/30/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and draft summaries reflecting information from same	.50
05/31/20	H. Zimmer	Confer with Chris Carty on conference and prepare materials for same	.30
05/31/20	H. Zimmer	Review and analyze documents produced in adversary proceeding and revise summaries reflecting information from same	5.60

Total **\$188,867.50**



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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
J. D'Angelo	4.50	845.00	3,802.50
C. Carty	67.50	785.00	52,987.50
K. Kolb	13.50	610.00	8,235.00
S. Stockman	.90	435.00	391.50
D. Field	22.50	435.00	9,787.50
H. Zimmer	109.00	435.00	47,415.00
E. Plowman	57.60	420.00	24,192.00
G. Fromer	57.50	420.00	24,150.00
D. Kopf	.30	410.00	123.00
L. Schepp	43.60	335.00	14,606.00
S. O'Donnell	3.10	1025.00	3,177.50

DISBURSEMENTS

Online Research	813.93
Pacer Charges	179.20
Total disbursements	\$993.13



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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
-		
	380.00	\$188,867.50
Subtotals	380.00	\$188,867.50



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

July 16, 2020
Bill Number: 356648
File Number: 19609-0002

Re: Jointly Asserted Causes of Action

Fees for legal services rendered through June 30, 2020	\$153,986.50
Expenses posted through June 30, 2020	850.74
TOTAL	\$154,837.24

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
06/01/20	C. Anderson		Confer with C. Carty re: research on causes of action	.20
06/01/20	C. Carty		Call with K. Kolb and H. Zimmer re third party discovery search terms (0.1); review and analyze third party discovery search terms (0.3).	.40
06/01/20	C. Carty		Call with C. Anderson re research assignment.	.20
06/01/20	C. Carty		Prepare for initial pretrial conference.	1.50
06/01/20	C. Carty		Correspondence with recipient of third party discovery.	.20
06/01/20	E. Plowman		Review Amended 26(f) report.	1.10
06/01/20	E. Plowman		Review and analyze documents in adversary proceeding	4.10
06/01/20	G. Fromer		Review amended complaint and revise facts section of memo on claims	2.50
06/01/20	G. Fromer		Conduct legal research on choice of law and draft choice of law analysis for claims memo	4.00
06/01/20	H. Zimmer		Review emails between Herrick and Blackstone concerning subpoena	.10
06/01/20	H. Zimmer		Review email from WLRK concerning subpoena	.10



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06/01/20	H. Zimmer	Confer with UBS concerning subpoena	.10
06/01/20	K. Kolb	Email and summary of parameters to Blackstone's counsel	.30
06/01/20	K. Kolb	Analyze RPT minutes and related emails regarding derivative litigation	.30
06/01/20	K. Kolb	Analyze and revise summaries of key documents produced relating to Seritage transaction	3.10
06/01/20	S. O'Donnell	Prep for conference.	.50
06/02/20	C. Anderson	Review and analyze case law, prior research and memorandums on aiding and abetting causes of action	2.00
06/02/20	C. Carty	Update status of third party discovery.	.20
06/02/20	C. Carty	Prepare for initial pretrial conference.	1.10
06/02/20	D. Field	Review documents produced in adversary proceeding	.60
06/02/20	E. Plowman	Review and analyze documents in adversary proceedings.	6.40
06/02/20	G. Fromer	Conduct legal research on choice of law and draft choice of law analysis for claims memo	1.70
06/02/20	H. Zimmer	Confer with Dan Field on document review and summaries reflecting same	.20
06/02/20	H. Zimmer	Revise discovery chart and send to Akin Gump	.20



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06/02/20	H. Zimmer	Confer with Chris Carty concerning preparation for initial conference and prepare documents for same and confer with exela	.80
06/02/20	H. Zimmer	Confer with Wilmer Hale, counsel for Blackstone, and counsel for Deloitte on subpoenas	.40
06/02/20	J. D'Angelo	Review correspondence to Court and defense counsel.	.20
06/03/20	C. Anderson	Review prior filings and memorandum on aiding and abetting causes of action	.30
06/03/20	C. Anderson	Research causes of action under Illinois law	.50
06/03/20	C. Anderson	Research and analyze causes of action under New York law	1.20
06/03/20	C. Carty	Call with counsel to Cyrus re discovery status.	.20
06/03/20	C. Carty	Review and analyze documents related to prepetition transfer adversary proceeding.	1.30
06/03/20	D. Field	Review documents produced in adversary proceeding	.70
06/03/20	H. Zimmer	Confer with Chris Carty and Sean O'Donnell concerning June 9 conference with the Court	.30
06/03/20	H. Zimmer	Confer with Kyle Kolb and Chris Carty concerning discovery and revise chart reflecting same and send to Akin Gump	.20



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06/03/20	K. Kolb	Emails regarding discovery negotiations	.20
06/03/20	S. O'Donnell	Prep for pretrial conference conference.	.50
06/04/20	C. Anderson	Confer with K. Kolb on sears memo and ongoing research	.10
06/04/20	C. Anderson	Conference call with K. Kolb, G. Fromer and H. Zimmer on open research items for memo	.20
06/04/20	C. Anderson	Research and analyze aiding and abetting causes of action under Illinois law	1.30
06/04/20	C. Carty	Review and analyze Akin letter to court re discovery schedule (0.2); prepare for initial pretrial conference (0.5).	.70
06/04/20	C. Carty	Review and analyze documents produced in the prepetition transfer adversary proceeding.	.80
06/04/20	G. Fromer	Discuss research for choice of law analysis in claims memo	.10
06/04/20	G. Fromer	Discuss choice of law analysis for claims memo	.40
06/04/20	G. Fromer	Discuss further research for choice of law analysis in potential claims memo	.10
06/04/20	G. Fromer	Draft choice of law analysis for claims memo	.30
06/04/20	H. Zimmer	Review Akin Letter concerning proposed schedule and confer with Chris Carty on same	.20



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06/04/20	H. Zimmer	Confer with KK and Gabrielle Fromer on analysis for potential claims and review emails from Gabrielle Fromer on same	.40
06/04/20	H. Zimmer	Confer with Kyle Kolb and Laini John concerning court appearance on June 9	.10
06/04/20	H. Zimmer	Review draft of memo on analysis of claims and confer with Kyle Kolb and Conor Anderson on same	.70
06/04/20	H. Zimmer	Confer with Elizabeth Plowman on summaries of document review	.10
06/04/20	J. D'Angelo	Review correspondence with Court re: conference and scheduling.	.20
06/04/20	K. Kolb	Analyze letter to court on behalf of plaintiffs	.20
06/04/20	K. Kolb	Analyze prior researching regarding claims and discuss with team	1.40
06/05/20	C. Anderson	Revise research re: Illinois causes of action and elements relating to aiding and abetting	.80
06/05/20	G. Fromer	Draft choice of law analysis for claims memo	3.30
06/05/20	H. Zimmer	Revise memorandum on RLF production	3.50
06/05/20	J. D'Angelo	Review correspondence with court clerk re: briefing and conference.	.20
06/05/20	S. O'Donnell	Prep for pretrial conference..	1.00



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06/06/20	C. Carty	Call with S. O'Donnell re Sears hearing prep.	.40
06/06/20	H. Zimmer	Review documents produced by RLF and revise memorandum on RLF production	2.00
06/06/20	S. O'Donnell	Prep for pretrial conference; confer w/ CC re same.	1.50
06/07/20	H. Zimmer	Review documents produced by RLF and revise memorandum on RLF production	3.20
06/07/20	S. O'Donnell	Pretrial conference prep.	1.00
06/08/20	C. Anderson	Research under Delaware law causes of action and elements for aiding and abetting, fraud and fiduciary duty for legal memorandum	2.00
06/08/20	C. Carty	Prepare for initial pretrial conference (0.9); call with Milbank regarding status of Cyrus discovery (0.2); correspondence with Milbank summarizing call (0.2).	1.30
06/08/20	E. Plowman	Review and analyze documents in adversary proceeding	8.20
06/08/20	G. Fromer	Conduct legal research on choice of law and draft choice of law analysis for claims memo	3.90
06/08/20	H. Zimmer	Review revisions to memorandum on RLF production, review documents produced by RLF and revise memorandum	1.10



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06/08/20	H. Zimmer	Review documents produced by RLF and revise memorandum on same	2.50
06/08/20	H. Zimmer	Confer with Dean Chapman concerning discovery status for June 9 conference and confer with Chris Carty and Kyle Kolb concerning June 9 conference	1.30
06/08/20	H. Zimmer	Confer with Chris Carty concerning June 9 conference	.10
06/08/20	H. Zimmer	Confer with Chris Carty and UBS concerning subpoena	.20
06/08/20	K. Kolb	Analyze research summary regarding claims	.20
06/08/20	K. Kolb	Revise memo summarizing documents produced by third party subpoena recipient	1.40
06/08/20	S. O'Donnell	Prep for pretrial conference conference.	1.00
06/09/20	C. Anderson	Analyze and summarize DE causes of action for use in legal memorandum	2.00
06/09/20	C. Carty	Participate in initial pretrial conference (2.4); prepare for same (0.5).	2.90
06/09/20	D. Field	Review documents produced in adversary proceeding	2.40
06/09/20	E. Plowman	Review and analyze documents in adversary proceeding	8.70



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06/09/20	H. Zimmer	Prepare for conference before Judge Drain and attend conference telephonically before Judge Drain	2.90
06/09/20	H. Zimmer	Revise memorandum on documents produced by RLF, confer with KK and LS concerning same and send to Chris Carty	2.30
06/09/20	H. Zimmer	Revise task list and confer with CC concerning third party discovery	.30
06/09/20	H. Zimmer	Review notes from chris carty concerning conference and draft summary of same	.40
06/09/20	H. Zimmer	Review email from Dean Chapman concerning conference	.20
06/09/20	H. Zimmer	Review hit reports from Cyrus	.20
06/09/20	H. Zimmer	Review email from Dean Chapman concerning proposed schedule and oral argument breakdown	.20
06/09/20	H. Zimmer	Review documents marked hot	.50
06/09/20	K. Kolb	Revise document production summary memo	.10
06/09/20	K. Kolb	Analyze Cyrus hit report	.20
06/09/20	K. Kolb	Revise summaries of key documents regarding Seritage transaction	.40
06/09/20	K. Kolb	Analyze key documents identified during first level document review	.30
06/09/20	K. Kolb	Revise summaries of key documents regarding related party financings	1.70



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06/09/20	L. Schepp	Review RLF production documents to identify possible issues impacting attorney review of documents.	1.80
06/09/20	S. O'Donnell	Coordinate prep for pretrial conference; confer w/ cc re same; f/up re same; confer re Wachtell implications.	1.50
06/10/20	D. Field	Review documents produced in adversary proceeding	.20
06/10/20	H. Zimmer	Email with Chris Carty and Kyle Kolb concerning discovery, email Cyrus counsel (Milbank) concerning meet and confer over document production	.60
06/10/20	H. Zimmer	Review documents produced in adversary proceeding and 2004 investigation and confer with Chris Carty on same	5.80
06/10/20	H. Zimmer	Email Wachtell concerning document production	.10
06/10/20	H. Zimmer	Confer with Wilmer Hale concerning UBS subpoena	.10
06/10/20	H. Zimmer	Confer with Herrick team concerning June 9 conference before Judge Drain and Akin's proposed schedule	.30
06/10/20	H. Zimmer	Review email from Akin Gump concerning proposed schedule	.20



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06/10/20	J. D'Angelo	Review summary of preliminary conference regarding scheduling, discovery, oral argument, etc.; review filings.	.60
06/10/20	K. Kolb	Analyze proposed case schedule	.20
06/10/20	L. Schepp	Update numerous deposition kits prior to attorney reviews	4.80
06/10/20	S. O'Donnell	Confer re discovery language; review and comment on same.	.30
06/11/20	C. Anderson	Research and analyze available damages for causes of action (aiding and abetting & malpractice) in NY	1.20
06/11/20	C. Carty	Call with K. Kolb and H. Zimmer re adversary proceeding discovery status (0.5); call with counsel to Cyrus regarding document requests (0.3); follow up re Cyrus discovery meet and confer (0.3).	1.10
06/11/20	C. Carty	Analyze issues related to discovery in connection with adversary proceeding.	.90
06/11/20	C. Carty	Review and analyze memorandum regarding RLF document production.	1.10
06/11/20	D. Field	Review documents produced in adversary proceeding	1.70
06/11/20	H. Zimmer	Confer with Chris Carty on Cyrus search parameters	.10



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06/11/20	H. Zimmer	Confer with Chris Carty and Kyle Kolb concerning discovery on Cyrus and third parties	.70
06/11/20	H. Zimmer	Review documents produced in adversary proceeding and 2004 investigation and prepare list of transactions for UBS and Cyrus list	4.90
06/11/20	H. Zimmer	Review email from Wachtell concerning subpoena and confer with Herrick concerning same	.20
06/11/20	H. Zimmer	Confer with Linda Schepp and Kyle Kolb concerning RLF hot documents and revise memorandum	.40
06/11/20	H. Zimmer	Confer with Dan Field on document review	.20
06/11/20	H. Zimmer	Meet and confer with counsel for Cyrus concerning document production and requests	.20
06/11/20	K. Kolb	Attend call with counsel for Cyrus and attend to follow-up	.50
06/11/20	K. Kolb	Discovery third party discovery status and strategy with H. Zimmer and C. Carty	.50
06/11/20	K. Kolb	Revise correspondence to subpoena recipient	.10
06/11/20	K. Kolb	Revise descriptions of key documents regarding pre-petition financings	.30
06/11/20	L. Schepp	Update document production tracker for attorney review	1.80



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06/11/20	L. Schepp	Working with vendor and H. Zimmer regarding export of RLF hot documents for attorney review	1.50
06/11/20	S. O'Donnell	Case admin.	.20
06/12/20	C. Carty	Correspondence with Defendants' counsel re status of third party subpoena (0.1); call with Defendants' counsel re same (0.1).	.20
06/12/20	G. Fromer	Draft choice of law analysis for potential claims memo	.10
06/12/20	H. Zimmer	Prep for call with Wilmer Hale concerning UBS subpoena and attend same	.40
06/12/20	H. Zimmer	Draft summary of transactions in which UBS was involved with Sears and send same to Chris Carty	2.50
06/12/20	H. Zimmer	Conduct research on claims and draft memorandum on same	.80
06/12/20	H. Zimmer	Email Deloitte concerning document production and review email from Deloitte concerning same	.20
06/12/20	H. Zimmer	Confer with Chris Carty and Kyle Kolb concerning subpoena to Robbins Arroyo and Girard Sharp	.20
06/12/20	J. D'Angelo	Catch up on team emails, etc.	.30
06/12/20	L. Schepp	Compile and organize RLF hot documents for attorney review.	4.80



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06/13/20	H. Zimmer	Conduct research on claims and draft memorandum on same and review documents produced in adversary proceeding	3.50
06/14/20	H. Zimmer	Conduct research on claims, revise research from Gabrielle Fromer and re-draft section on statute of limitation and choice of law, and revise memorandum on same	5.80
06/15/20	C. Carty	Review and analyze Cyrus reply brief in connection with motion to dismiss.	1.20
06/15/20	E. Plowman	Began reviewing replies in support of defendants' motions to dismiss.	.30
06/15/20	H. Zimmer	Conduct research on claims and revise memoranda and arguments from Gabrielle Fromer	5.10
06/15/20	H. Zimmer	Review documents produced in adversary proceeding concerning Cyrus	1.20
06/15/20	H. Zimmer	Review emails exchanged between Herrick, Wilmer Hale, and Wachtell in connection with document production by Wachtell and respond to same	.20
06/15/20	H. Zimmer	Confer with LS and KK concerning MTD replies	.20
06/15/20	H. Zimmer	Confer with counsel for UBS concerning subpoena	.20



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06/15/20	J. D'Angelo	High level review of reply briefs and supporting papers (other than Cyrus Defendants' reply); review emails re: same.	2.30
06/15/20	K. Kolb	Discuss research items and progress with H. Zimmer	.20
06/15/20	K. Kolb	Analyze motion to dismiss reply briefs	3.10
06/15/20	L. Schepp	Compile Reply Memorandums of Law and supporting documents for attorney review.	3.70
06/15/20	L. Schepp	Work on assembly of RLF hot documents for attorney review.	2.20
06/16/20	C. Anderson	Research available damages for aiding and abetting causes of action in Delaware and Illinois	1.10
06/16/20	C. Carty	Meet and confer call with in-house counsel for UBS in connection with third party subpoena (0.2); meet and confer call with Wachtell in connection with third party subpoena and prepare for same (1.0); review correspondence re same (0.3).	1.50
06/16/20	D. Field	Review documents produced in adversary proceeding	1.20
06/16/20	G. Fromer	Discuss revisions to claims analysis memo	.50
06/16/20	G. Fromer	Draft and revise choice of law analysis for claims	.80



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06/16/20	H. Zimmer	Confer with KK and CC on email to Cyrus concerning document production and Girard/Robbins	.20
06/16/20	H. Zimmer	Email counsel for Cyrus concerning document production in response to doc requests	.10
06/16/20	H. Zimmer	Conference call with Wachtell and Wilmer Hale on discovery production	.80
06/16/20	H. Zimmer	Call with Gabrielle Fromer on memorandum concerning claims	.50
06/16/20	H. Zimmer	Draft email to Wachtell concerning discovery production, finalize notes on meet and confer process, and confer with KK and CC on same	.70
06/16/20	H. Zimmer	Call with UBS concerning subpoena, draft notes, and confer Chris Carty on same	.50
06/16/20	J. D'Angelo	Review and analyze Cyrus and ESL reply briefs in further support of their motions to dismiss; e-mail re: discovery scheduling.	1.70
06/16/20	K. Kolb	Meet and confer with counsel for third party and related follow-up items	1.30
06/16/20	K. Kolb	Analyze proposed revisions to case schedule	.10
06/16/20	K. Kolb	Revise email to Cyrus regarding document review	.20
06/16/20	K. Kolb	Analyze replies to motions to dismiss	.80



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06/16/20	K. Kolb	Emails regarding second level review and related issues	.40
06/16/20	L. Schepp	Continued assembly of RLF documents for attorney review.	1.90
06/16/20	L. Schepp	Compile additional Reply Motion to Dismiss filings for attorney review.	.30
06/16/20	L. Schepp	Compile RLF documents for attorney review.	.40
06/16/20	S. O'Donnell	Prep and conduct meet and confer call w/ Wachtell; f/up re same; confer re case scheduling.	1.50
06/17/20	C. Anderson	Research and summarize recoverable damages in New York for causes of action	.50
06/17/20	C. Anderson	Research and summarize available damages in Illinois.	.60
06/17/20	C. Anderson	Research and summarize recoverable damages in Delaware	.90
06/17/20	C. Carty	Call with D. Chapman re meet and confer with Wachtell re third party discovery (0.3).	.30
06/17/20	C. Carty	Correspondence related to discovery in connection with prepetition adversary proceeding.	.80
06/17/20	E. Plowman	Review replies in further support of defendants' motions to dismiss	1.90
06/17/20	G. Fromer	Draft and revise choice of law analysis for potential claims	1.50



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06/17/20	H. Zimmer	Conmduct research on cost shifting and email KK on same	.60
06/17/20	H. Zimmer	Revise task list and confer with KK on review of documents produced in adversary proceeding	.40
06/17/20	H. Zimmer	Review email from Cyrus concerning document production and confer with KK and CC concerning same	.10
06/17/20	H. Zimmer	Confer with CC and KK on Wachtell production	.10
06/17/20	H. Zimmer	Review case schedule revisions from Akin Gump	.10
06/17/20	J. D'Angelo	Follow up/finish reviewing MTD reply briefs and task list.	1.30
06/17/20	K. Kolb	Revise task list	.20
06/17/20	K. Kolb	Analyze revisions to case schedule proposal	.10
06/17/20	K. Kolb	Analyze reply briefs on motions to dismiss	.50
06/17/20	K. Kolb	Analyze email from counsel for Cyrus	.10
06/17/20	L. Schepp	Assemble additional RLF hot documents for attorney review.	3.40
06/17/20	S. O'Donnell	Attend to Discovery.	.50
06/18/20	C. Carty	Review and analyze motion to dismiss reply briefing.	2.10
06/18/20	D. Field	Review documents produced in adversary proceeding	2.60



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06/18/20	K. Kolb	Analyze reply briefs on motion to dismiss	.70
06/19/20	C. Carty	Review and analyze draft initial disclosures.	.50
06/19/20	H. Zimmer	Conduct research on burden for non-party to produce in connection with Girard and Robins subpoena and draft write-up on same	2.40
06/19/20	H. Zimmer	Review email from Akin Gump, Jeff Latov, with initial disclosures	.20
06/19/20	K. Kolb	Review reply briefs on motions to dismiss	1.00
06/19/20	L. Schepp	Compile and assemble RLF documents cited in memorandum in preparation for attorney review.	3.10
06/20/20	H. Zimmer	Research potential claims against third parties and revise draft of memorandum on same and finalize research on burden in response to objection from Girard/Robbins	1.10
06/20/20	K. Kolb	Analyze reply briefs on motion to dismiss	.60
06/21/20	H. Zimmer	Review documents produced in adversary proceeding and Rule 2004 investigation and compile search terms for UBS search parameters	.70
06/22/20	C. Carty	Analyze issues related to discovery in connection with prepetition transfer adversary proceeding.	1.20



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06/22/20	D. Field	Continue review of documents produced in adversary proceeding	1.80
06/22/20	G. Fromer	Draft and revise choice of law analysis for claims, research equitable tolling doctrine under New York, Delaware, and Illinois law	3.50
06/22/20	H. Zimmer	Confer with LS on binders for RLF	.10
06/22/20	H. Zimmer	Review hits reports from WLRK	.30
06/22/20	H. Zimmer	Confer with DF on review of documents produced in adversary proceeding	.10
06/22/20	H. Zimmer	Review hit reports from WLRK and Committee's parameters in connection with subpoena and confer with KK on same	.20
06/22/20	H. Zimmer	Draft email concerning subpoena onaronstam, confer with CC on UBS subpoena, and and confer with KK and CC on Cyrus production	.40
06/22/20	J. D'Angelo	Review recent filings including letter to Court re: Cyrus Defendants' motion to dismiss and related link.	1.00
06/22/20	K. Kolb	Email to counsel for Wachtell regarding subpoena response	.10
06/22/20	K. Kolb	Analyze hit report from subpoena recipient	.40



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06/22/20	K. Kolb	Revise summaries of key documents regarding pre-petition financings	.90
06/22/20	L. Schepp	Update memo and files related to RLF subpoena documents for attorney review.	2.90
06/23/20	D. Field	Review documents produced in adversary proceeding	3.00
06/23/20	G. Fromer	Discuss memo on potential claims	.10
06/23/20	G. Fromer	Revise memo on potential claims	1.60
06/23/20	H. Zimmer	Confer with KK on summaries of work product of documents marked hot in initial review of documents produced in adversary proceeding, research on potential claims, and initial disclosures	.40
06/23/20	H. Zimmer	Confer with GF on research on claims	.10
06/23/20	H. Zimmer	Email Akin Gump concerning search parameters for third-party discovery	.20
06/23/20	H. Zimmer	Review email from Blackstone concerning production in response to subpoena	.10
06/23/20	H. Zimmer	Review revised hit reports from WLRK concerning production of external communications	.20
06/23/20	H. Zimmer	Revise initial disclosures and confer with KK and CC on same	.90



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06/23/20	H. Zimmer	Review email from WLRK concerning hit reports in response production	.10
06/23/20	H. Zimmer	Confer with CC and KK concerning Cyrus production in response to doc requests	.10
06/23/20	K. Kolb	Call with counsel at Wachtell	.10
06/23/20	K. Kolb	Discuss pending discovery items with H. Zimmer	.30
06/23/20	K. Kolb	Analyze search term results from opposing counsel	.70
06/23/20	L. Schepp	Compile Motion to Dismiss briefs for attorney review.	.90
06/23/20	L. Schepp	Revise file names and pdfs for RLF hot document review.	2.80
06/24/20	D. Field	Complete review of documents produced in adversary proceeding	.60
06/24/20	G. Fromer	Revise choice of law analysis memo on potential claims	4.20
06/24/20	G. Fromer	Discuss revisions to memo on claims	.20
06/24/20	G. Fromer	Discuss summaries of documents of interest	.10
06/24/20	G. Fromer	Review summaries of documents of interest	.20
06/24/20	H. Zimmer	Revise initial disclosures	.50
06/24/20	H. Zimmer	Revise work product in connection with review of documents produced in adversary proceeding	.60



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06/24/20	H. Zimmer	Review work product in connection with review of documents produced in adversary proceeding, confer with KK on same and revise task list	1.00
06/24/20	H. Zimmer	Revise memorandum on claims and send same to KK	.20
06/24/20	H. Zimmer	Revise and send task list	.20
06/24/20	H. Zimmer	Conduct research in support of claims against third parties	3.10
06/24/20	K. Kolb	Email to Wachtell regarding parameters	.10
06/24/20	K. Kolb	Revise initial disclosures	.60
06/24/20	K. Kolb	Review research.	.40
06/24/20	K. Kolb	Revise key document summaries	.40
06/24/20	K. Kolb	Revise memorandum regarding claims analysis	.70
06/24/20	L. Schepp	Revise RLF documents cited in memorandum in preparation for attorney review.	1.60
06/25/20	C. Carty	Review and comment on draft initial disclosures in connection with prepetition transfer adversary proceeding.	1.20
06/25/20	G. Fromer	Respond to counsel's question about statute of limitations	.20
06/25/20	G. Fromer	Discuss revisions to memo on claims	.10



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06/25/20	G. Fromer	Review Plaintiffs' Brief in Opposition to Defendants' Motion to Dismiss Breach of Fiduciary Duty and Aiding and Abetting Breach of Fiduciary Duty Claims for statute of limitations analysis	.90
06/25/20	H. Zimmer	Confer with Akin on initial disclosures	.10
06/25/20	H. Zimmer	Revise memorandum on claims of third parties	1.60
06/25/20	H. Zimmer	Confer internally with KK and CC on UBS parameters, initial disclosures, and Blackstone discovery	.50
06/25/20	H. Zimmer	Revise notes from call with Blackstone and send to KK	.20
06/25/20	H. Zimmer	Confer with LS and KK on discovery for third parties	.40
06/25/20	H. Zimmer	Revise initial disclosures and confer with LS on RLF production memo	1.00
06/25/20	H. Zimmer	Confer with KK on documents produced in adversary proceeding and ongoing discovery	.30
06/25/20	H. Zimmer	Draft UBS search parameters in connection with response to subpoena	1.00
06/25/20	H. Zimmer	Review documents produced in adversary proceeding and work product on same	.20



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06/25/20	K. Kolb	Call with G. Fromer regarding research	.20
06/25/20	K. Kolb	Analyze case law and research summary memo regarding choice of law issues	3.20
06/25/20	L. Schepp	Update coding for various hot documents based on attorney review notes.	3.10
06/25/20	S. O'Donnell	Review Cyrus reply memo.	1.00
06/26/20	C. Carty	Review and comment on search terms.	.40
06/26/20	D. Field	Additional review of documents produced in adversary proceeding	.80
06/26/20	H. Zimmer	Confer with KK on summaries of review of WLRK documents produced	.10
06/26/20	H. Zimmer	Confer with KK on Blackstone response to subpoena and protective order	.20
06/26/20	H. Zimmer	Revise UBS parameters and e-mail Wilmer Hale a copy of same	.60
06/26/20	H. Zimmer	Confer with LS on RLF production and review updated memorandum and e-binders	.80
06/26/20	K. Kolb	Email and further analysis of proposal from Blackstone	.50
06/26/20	K. Kolb	Revise descriptions of hot documents	2.00



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06/26/20	L. Schepp	Revise coding on reviewed hot documents and export documents as requested.	2.30
06/27/20	K. Kolb	Analyze and revise summaries of key documents regarding Seritage transaction	1.70
06/28/20	K. Kolb	Analyze key documents regarding Seritage transaction	1.20
06/29/20	C. Carty	Attention to issues related to third party discovery in connection with prepetition transfer adversary proceeding.	.80
06/29/20	D. Field	Review documents produced in adversary proceeding tagged as hot	.30
06/29/20	H. Zimmer	Confer with KK and CC, revise task list on ongoing discovery and projects	.50
06/29/20	H. Zimmer	Confer and review WLRK emails and update working doc for review	1.00
06/29/20	H. Zimmer	Confer with KK on discovery	.20
06/29/20	H. Zimmer	Revise document for outlining review of documents for adversary proceeding, list of key players, and terms, and review document from Gabrielle Fromer concerning working group list, and review emails from KK and CC concerning discovery	5.90
06/29/20	K. Kolb	Call with H. Zimmer regarding document review workstream	.20



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06/29/20	K. Kolb	Summarize issue relating to objection from counsel for Blackstone regarding subpoena	.30
06/29/20	K. Kolb	Revise summaries of key documents related to Seritage transaction	1.70
06/29/20	L. Schepp	Compile hot documents for attorney secondary review.	.60
06/30/20	H. Zimmer	Review e-binders compiled by Linda Schepp of production from RLF and confer with Linda Schepp on same, and revise memorandum on RLF production	.90
06/30/20	H. Zimmer	Confer with KK on discovery, analyze wachtell hit reports to narrow scope of subpoena, and review documents produced in adversary proceeding	1.00
06/30/20	H. Zimmer	Revise Blackstone email	.40
06/30/20	K. Kolb	Analyze letter to court regarding discovery dispute	.30
06/30/20	K. Kolb	Draft email to opposing counsel regarding confidentiality issue	.20
06/30/20	K. Kolb	Analyze search term reports from opposing counsel on subpoena	.40
06/30/20	K. Kolb	Revise summaries of key documents regarding Seritage transaction	.80
06/30/20	L. Schepp	Discussion with H. Zimmer and revise RLF documents for attorney review.	.70



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Total \$153,986.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
J. D'Angelo	7.80	845.00	6,591.00
C. Carty	24.50	785.00	19,232.50
K. Kolb	38.10	610.00	23,241.00
H. Zimmer	93.10	435.00	40,498.50
D. Field	15.90	435.00	6,916.50
G. Fromer	30.30	420.00	12,726.00
E. Plowman	30.70	420.00	12,894.00
C. Anderson	14.90	415.00	6,183.50
L. Schepp	44.60	335.00	14,941.00
S. O'Donnell	10.50	1025.00	10,762.50

DISBURSEMENTS

Telecommunication Costs	210.00
Document Processing	87.50
Duplicating Supplies	8.16
Velobind/binding	20.00
Duplication	525.08

Total disbursements \$850.74



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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
-		
	310.40	\$153,986.50
Subtotals	310.40	\$153,986.50



HERRICK

FEDERAL ID: 13-2991662

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

August 24, 2020
Bill Number: 358158
File Number: 19609-0002

Re: Jointly Asserted Causes of Action

Fees for legal services rendered through July 31, 2020	\$112,293.00
Expenses posted through July 31, 2020	2,101.47
TOTAL	\$114,394.47

**Kindly return this page with your
check payment to:**
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS



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LEGAL SERVICES

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Time</u>
07/01/20	C. Carty		Call with H. Zimmer and K. Kolb (portion of call) re open discovery issues (1.5); prepare for same (0.7); analyze issues related to third party discovery in connection with prepetition transfer adversary proceeding (1.2).	3.40
07/01/20	H. Zimmer		Confer with Herrick and Akin concerning Blackstone	.10
07/01/20	H. Zimmer		Review documents produced in adversary proceeding and revise transaction list for UBS subpoena	.90
07/01/20	H. Zimmer		Confer with KK re: ongoing discovery	.20
07/01/20	H. Zimmer		Email Deloitte concerning status of production	.10
07/01/20	K. Kolb		Analyze letter from counsel for Fairholme	.10
07/01/20	K. Kolb		Draft email to counsel for Blackstone	.20
07/01/20	K. Kolb		Analyze research regarding potential claims	.40
07/01/20	K. Kolb		Discuss case background with R. Quigley	.30
07/01/20	K. Kolb		Email co-counsel regarding meet and confer issue	.40
07/01/20	K. Kolb		Discuss case status with H. Zimmer	.90



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07/01/20	L. Schepp	Update hot document searches for attorney review	2.70
07/02/20	C. Carty	Call with Akin team regarding discovery status and prepare for same (0.6); review and analyze memorandum regarding RLF document production (1.1).	1.70
07/02/20	H. Zimmer	Confer with CC and KK concerning WLRK subpoena	.20
07/02/20	H. Zimmer	Confer with CC and KK regarding RLF memorandum and revise same/review e-binders	.90
07/02/20	H. Zimmer	Confer with Wilmer Hale concerning UBS subpoena	.10
07/02/20	H. Zimmer	Confer with Akin Gump concerning Girard Robbins	.10
07/02/20	H. Zimmer	Confer with LS concerning review of documents produced in adversary proceeding	.20
07/02/20	H. Zimmer	Call with Akin concerning discovery	.30
07/02/20	H. Zimmer	Confer with Chris Carty concerning UBS	.20
07/02/20	H. Zimmer	Confer with KK and LS concerning hot doc review	.20
07/02/20	H. Zimmer	Review documents produced in adversary proceeding	.50
07/02/20	K. Kolb	Revise memo regarding third party document production	1.00



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07/02/20	K. Kolb	Attend call with Akin regarding third party confidentiality issue	.60
07/02/20	L. Schepp	Work with H. Zimmer to revise and finalize documents cite in memorandum for attorney review.	2.10
07/02/20	L. Schepp	Create Cyrus Capital domain searches in Relativity for H. Zimmer review	.40
07/02/20	L. Schepp	Revise issue searches for new hot docs with H5	4.20
07/03/20	K. Kolb	Analyze case law regarding claim accrual	.30
07/05/20	S. O'Donnell	Case admin.	.50
07/06/20	H. Zimmer	Confer with Blackstone, Kyle Kolb, and Chris Carty concerning third part discovery	.30
07/06/20	H. Zimmer	Confer with Aronstam, and Wilmer Hale concerning Aronstam subpoena	.10
07/06/20	H. Zimmer	Confer with Herrick concerning e-binders and memo for RLF Production to send to Akin	.20
07/06/20	H. Zimmer	Confer with Chris Carty and Kyle Kolb concerning subpoenas and third-party productions (WLRK, Blackstone)	.20
07/07/20	C. Carty	Correspondence re third party discovery in connection with prepetition litigation adversary proceeding.	.50



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07/07/20	C. Carty	Analyze issues related to third party discovery in connection with prepetition litigation adversary proceeding.	.80
07/07/20	C. Carty	Finalize and circulate to co-counsel memo re third party document production.	.70
07/07/20	H. Zimmer	Confer concerning meet and confer re: Blackstone subpoena	.10
07/07/20	H. Zimmer	Confer with Chris Carty and Kyle Kolb re: WLRK subpoena, and confer with WLRK on same	.10
07/07/20	H. Zimmer	Confer with Herrick and Akin concerning RLF production	.20
07/07/20	H. Zimmer	Review proposed scheduling order	.30
07/07/20	H. Zimmer	Confer with Chris Carty and Kyle Kolb concerning memorandum on RLF production	.20
07/07/20	H. Zimmer	Review documents produced in adversary proceeding	2.00
07/07/20	H. Zimmer	Conference with Blackstone and Wilmer Hale concerning Blackstone's production and draft notes on same	.60
07/07/20	H. Zimmer	Confer with Chris Carty and Kyle Kolb concerning potential subpoenas	.20
07/07/20	H. Zimmer	Revise task list	.40



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07/07/20	H. Zimmer	Confer with Kyle Kolb concerning Blackstone subpoena and Linda Schep and Kyle Kolb concerning hot doc review	.40
07/07/20	K. Kolb	Draft email to counsel for Seritage	.40
07/07/20	K. Kolb	Analyze proposed case schedule	.20
07/07/20	K. Kolb	Follow-up regarding meet and confer with subpoena recipient	.30
07/07/20	K. Kolb	Prepare for and attend call with counsel for Blackstone	1.30
07/07/20	L. Schepp	Update hot documents charts and coding, per K. Kolb,	2.40
07/08/20	C. Carty	Analyze issues related to discovery in connection with prepetition adversary proceeding.	.80
07/08/20	H. Zimmer	Confer with Wilmer Hale concerning WLRK and UBS	.10
07/08/20	H. Zimmer	Confer with Kyle Kolb and Chris Carty concerning third party discovery	.20
07/08/20	H. Zimmer	Draft email to Cyrus concerning proposed scheduling order and send same	.20
07/08/20	H. Zimmer	Revise Sears task list, review scheduling order, and confer with KK on discovery and CC	1.00
07/08/20	H. Zimmer	Review email from WLRK concerning production	.10
07/08/20	K. Kolb	Revise memo regarding claims analysis	.60



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07/09/20	C. Carty	Call with counsel to Seritage regarding privilege issues in connection with Deloitte document review.	.30
07/09/20	C. Carty	Review and analyze documents produced in connection with prepetition adversary proceeding.	2.20
07/09/20	C. Carty	Correspondence for litigation trust board related to billing.	.30
07/09/20	C. Carty	Analyze privilege issues related to third party discovery.	.50
07/09/20	C. Carty	Review and analyze proposal re privilege logs.	.40
07/09/20	H. Zimmer	Confer with Kyle Kolb on draft to Akin concerning discovery issues, and confer with Akin on same	.30
07/09/20	H. Zimmer	Confer with Cyrus' counsel concerning meet and confer on privilege log	.10
07/09/20	H. Zimmer	Confer with CC on Aronstam subpoena	.10
07/09/20	H. Zimmer	Confer with CC and KK concerning Aronstam subpoena	.20
07/09/20	H. Zimmer	Email Aronstam and Wilmer Hale concerning Aronstam subpoena	.10
07/09/20	H. Zimmer	Review and analyze memorandum on RLF production and hot docs tagged	1.00
07/09/20	K. Kolb	Email to Akin regarding discovery issues	.20



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07/09/20	K. Kolb	Call with counsel for Seritage regarding privilege review	.30
07/09/20	K. Kolb	Further discussion and analysis of subpoena meet and confer issue regarding confidentiality	.30
07/09/20	K. Kolb	Further emails and discussion of third party discovery status with Akin	.50
07/09/20	K. Kolb	Analyze memorandum regarding RLF production	.50
07/10/20	C. Carty	Call with co-counsel at Akin and K. Kolb and H. Zimmer re privilege logs and open discovery issues and prepare for same.	.80
07/10/20	C. Carty	Review and analyze documents produced in connection with prepetition adversary proceeding.	1.50
07/10/20	H. Zimmer	Confer with KK and CC concerning AKin's email in connection with privilege logs and third party discovery	.10
07/10/20	H. Zimmer	Revise memo on key players and terms from review of documents produced in adversary proceeding and confer with KK on same	.30
07/10/20	H. Zimmer	Call with Akin on format of privilege log for defendants	.40
07/10/20	K. Kolb	Call with Akin regarding discovery status	.60
07/10/20	K. Kolb	Analyze memo regarding RLF production	.60



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07/10/20	K. Kolb	Prepare for and attend call with Akin regarding discovery issues	.50
07/10/20	K. Kolb	Analyze search term reports in connection with subpoena	.60
07/13/20	C. Carty	Meet and confer with counsel to Cyrus re privilege logs.	.10
07/13/20	C. Carty	Call with K. Kolb and H. Zimmer re open discovery issues.	.60
07/13/20	C. Carty	Analyze issues related to discovery in connection with prepetition transfer adversary proceeding.	1.50
07/13/20	H. Zimmer	Conference call with Cyrus on privilege logs and finalize notes on same	.20
07/13/20	H. Zimmer	Confer with Chris Carty and Kyle Kolb concerning third-party discovery	.50
07/13/20	H. Zimmer	Email Wilmer Hale concerning Wachtell subpoena	.10
07/13/20	K. Kolb	Call with counsel for Cyrus regarding privilege log format	.20
07/13/20	K. Kolb	Call with C. Carty and H. Zimmer regarding discovery status and meet and confer strategy	.30
07/13/20	K. Kolb	Revise proposed parameters for subpoena dispute resolution	.20



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07/14/20	C. Carty	Call with counsel for Aronstam re third party subpoena and prepare for same (1.1); call with counsel to Cyrus re document production (0.2); call with defense counsel re Wachtell document production and prepare for same (1.6).	2.90
07/14/20	C. Carty	Review and analyze letter re recent case law in connection with motion to dismiss.	.40
07/14/20	G. Fromer	Review Wilmer Hale letter regarding Boston Generating Case	.10
07/14/20	H. Zimmer	Confer with LS and KK re: documents produced in adversary proceeding	.20
07/14/20	H. Zimmer	Confer with Aronstam and Wilmer Hale concerning subpoena and finalize notes on same	1.00
07/14/20	H. Zimmer	Confer with WH concerning Wachtell subpoena and review hit reports	.40
07/14/20	H. Zimmer	Confer with KK concerning email to Deloitte re: subpoena	.20
07/14/20	H. Zimmer	Review documents produced in adversary proceeding and confer with KK on same	.40
07/14/20	H. Zimmer	Review email from KK concerning Blackstone and confer on same	.10
07/14/20	H. Zimmer	Confer with Chris Carty re: Aronstam subpoena	.10



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07/14/20	H. Zimmer	Confer with KK regarding discovery review	.10
07/14/20	K. Kolb	Analyze Blackstone proposal	.10
07/14/20	K. Kolb	Call with Wilmer Hale regarding third party discovery and follow-up call	.40
07/14/20	K. Kolb	Further analysis of search term reports	.40
07/14/20	K. Kolb	Draft email to Deloitte	.20
07/14/20	K. Kolb	Analyze letter from ESL defendants to court regarding supplemental authority	.20
07/14/20	L. Schepp	Compile WLKR invoices in H5 workspace for attorney review.	2.90
07/14/20	L. Schepp	Update document production index of H5 documents.	1.30
07/14/20	S. O'Donnell	Confer re correspondence re Boston Gen holding; analysis re same.	.40
07/15/20	C. Carty	Correspondence with co-counsel re third party discovery in connection with prepetition transfer adversary proceeding.	.30
07/15/20	G. Fromer	Discuss revisions to memo on potential cliams	.20



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07/15/20	H. Zimmer	Confer with Kyle Kolb and Akin concerning privilege research, confer with Blackstone concerning meet and confer on subpoena, review emails from Cyrus concerning production, and confer with H5 concerning cyrus production	.40
07/15/20	H. Zimmer	Confer with Linda Schepp and Kyle Kolb concerning review of documents produced in adversary proceeding	.20
07/15/20	K. Kolb	Analyze proposal regarding plan to analyze hot documents from 2004 investigations	.60
07/15/20	K. Kolb	Draft email to opposing counsel regarding subpoena production	.20
07/15/20	K. Kolb	Draft further email to Deloitte regarding subpoena	.20
07/15/20	K. Kolb	Prepare for and attend call regarding search term negotiations	.70
07/15/20	L. Schepp	Identify and index WLRK invoices in H5 workspace for attorney review.	5.40
07/15/20	L. Schepp	Revise hot docs searches for second round attorney review.	1.30
07/16/20	C. Carty	Analyze issues related to third party discovery and possible depositions.	2.10



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07/16/20	G. Fromer	Review Plaintiff's Opposition to Motion to dismiss breach of fiduciary duty and aiding and abetting breach of fiduciary duty claims, and ESL Defendant's motion to dismiss for choice of law and statute of limitations arguments	.70
07/16/20	G. Fromer	Review Boston Generating case to incorporate potential claims memo	.20
07/16/20	H. Zimmer	Confer with KK on discovery overview	.30
07/16/20	H. Zimmer	Confer with KK and LS concerning document produced in adversary proceeding	.50
07/16/20	H. Zimmer	Review documents produced in adversary proceeding and confer with KK and GF on issue tags for Cyrus production	.30
07/16/20	H. Zimmer	Review email and attachment from Cyrus counsel concerning document production	.20
07/16/20	H. Zimmer	Confer with GF and KK concerning potential claims	.40
07/16/20	H. Zimmer	Review Cyrus MTD and review documents produced in adversary proceeding	2.30
07/16/20	H. Zimmer	Conduct research on committee privilege	1.20
07/16/20	H. Zimmer	Review documents produced in adversary proceeding	.70



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07/16/20	K. Kolb	Discuss privilege waiver issue with H. Zimmer	.30
07/16/20	K. Kolb	Research privilege issue re waiver	.60
07/16/20	K. Kolb	Analyze results of search for invoices	.20
07/16/20	K. Kolb	Prepare for and draft summary of review process of party productions	.70
07/16/20	K. Kolb	Review letter regarding Boston Gen opinion	.20
07/16/20	L. Schepp	Continued indexing of WLRK invoices for attorney review and team discussion regarding Cyrus document review	4.40
07/17/20	G. Fromer	Review new document review assignment	.10
07/17/20	G. Fromer	Brainstorm issue tags for new set of documents	.20
07/17/20	G. Fromer	Review Cyrus Defendants' Motion to Dismiss	.20
07/17/20	G. Fromer	Discuss new document review assignment	.10
07/17/20	G. Fromer	Review documents of interest and draft summaries of each document	2.20
07/17/20	H. Zimmer	Conduct research on waiver of committee privilege	2.20
07/17/20	H. Zimmer	Confer with KK on document review	.10
07/17/20	H. Zimmer	Confer with KK, CC, and Akin Gump concerning privilege	.30



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07/17/20	H. Zimmer	Email WLRK concerning late production in response to subpoena	.10
07/17/20	H. Zimmer	Confer with LS and KK concerning document review	.30
07/17/20	H. Zimmer	Review emails between Herrick and H5 concerning document upload for review	.20
07/17/20	H. Zimmer	Review email from Aronstam concerning production	.10
07/17/20	H. Zimmer	Review email between Herrick and Cyrus counsel concerning production	.10
07/17/20	H. Zimmer	Confer with GF, EP, and KK concerning document review	.20
07/17/20	K. Kolb	Analyze recent case law on waiver issue	.20
07/17/20	K. Kolb	Discuss review project with G. Fromer	.10
07/17/20	K. Kolb	Analyze email from opposing counsel regarding RPT privilege	.10
07/17/20	K. Kolb	Analyze documents produced by Cyrus and attend to related review process and metadata issues	3.70
07/17/20	L. Schepp	Review Cyrus document production to identify any issues.	3.80
07/18/20	H. Zimmer	Review notes on document review and confer with KK on review of documents produced in adversary proceeding	.20



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07/18/20	H. Zimmer	Review documents produced in adversary proceeding	.90
07/18/20	H. Zimmer	Review documents produced in adversary proceeding	2.00
07/18/20	K. Kolb	Analyze documents produced by Cyrus	2.50
07/19/20	H. Zimmer	Revise email concerning Girard and Robbins, confer with KK and CC re: same, and conduct review of documents produced in adversary proceeding	2.40
07/20/20	G. Fromer	Review internal memo on document review issues	.20
07/20/20	G. Fromer	Review Cyrus Defendants Motion to Dismiss	.70
07/20/20	G. Fromer	Review Plaintiffs' Opposition to Cyrus Defendants' Motion to Dismiss	.50
07/20/20	G. Fromer	Review and issue tag documents produced by Cyrus Defendants	2.40
07/20/20	G. Fromer	Review new document review assignment	.30
07/20/20	G. Fromer	Review search parameters of document request	.10
07/20/20	H. Zimmer	Conduct review of documents produced in adversary proceeding, update chronology	1.60
07/20/20	H. Zimmer	Call with Blackstone and confer with KK on same	.20



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07/20/20	H. Zimmer	Review emails from Cyrus concerning error in production	.10
07/20/20	H. Zimmer	Confer with Linda Schepp and KK and GF re: documents produced in adversary proceeding	.10
07/20/20	H. Zimmer	Confer with H5 on document productions	.30
07/20/20	H. Zimmer	Confer with KK and CC re: WLRK belated document production	.10
07/20/20	H. Zimmer	Confer with EP, KK. and GF regarding review of documents produced in adversary proceeding	.20
07/20/20	H. Zimmer	Review documents produced in adversary proceeding	.60
07/20/20	K. Kolb	Prepare for and attend call with opposing counsel regarding subpoena	.30
07/20/20	K. Kolb	Discuss review of Cyrus production with H. Zimmer	.20
07/21/20	E. Plowman	Review and analyze documents in adversary proceeding	7.60
07/21/20	G. Fromer	Review and issue tag documents produced by Cyrus Defendants	4.30
07/21/20	H. Zimmer	Confer with KK re: Blackstone discovery	.20
07/21/20	H. Zimmer	Confer with KK and CC re: email to WLRK re: production and email WLRK re: production status	.20
07/21/20	H. Zimmer	Confer with KK regarding deponent list	.10



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07/21/20	H. Zimmer	Review notice of subpoena from Akin Gump re: Greenberg, Fisher, Emerald, and Collett	.50
07/21/20	H. Zimmer	Confer with KK, LS, and GF regarding document review	.20
07/21/20	H. Zimmer	Confer with Akin, CC, and KK regarding deposition list	.10
07/21/20	H. Zimmer	Confer with KK and LS regarding oral argument preparation	.10
07/21/20	H. Zimmer	Review email from Akin regarding deponent list	.10
07/21/20	H. Zimmer	Confer with Akin Gump regarding Aronstam	.10
07/21/20	H. Zimmer	Conduct review of documents produced in adversary proceeding	2.40
07/21/20	K. Kolb	Draft further proposal regarding subpoena parameters	.40
07/21/20	K. Kolb	Analyze draft list of deponents	.40
07/21/20	K. Kolb	Analyze key documents produced by Cyrus defendants	.50
07/21/20	K. Kolb	Initial prep for oral argument	.10
07/21/20	L. Schepp	Start compilation of cited authority in Cyrus' motion to dismiss briefing in preparation for oral argument	.50
07/21/20	L. Schepp	Update case files in Imanage; calendar discovery dates.	1.80
07/22/20	E. Plowman	Review and analyze documents in adversary proceeding	6.20



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07/22/20	G. Fromer	Review and issue tag documents produced by Cyrus Defendants	2.10
07/22/20	H. Zimmer	Draft UBS email and confer with CC on same and girard	.60
07/22/20	H. Zimmer	Review documents and notes and revise deponent list and communicate with KK re: same	.80
07/22/20	H. Zimmer	Revise task list	.30
07/22/20	H. Zimmer	Draft emails to Aronstam, confer re: task list, confer with WLRK,	1.00
07/22/20	H. Zimmer	Review email from WLRK regarding belated production	.10
07/22/20	H. Zimmer	Confer with GF, KK, and EP regarding deponent list	.10
07/22/20	H. Zimmer	Confer with KK regarding discovery and task list	.10
07/22/20	H. Zimmer	Confer with CC and KK regarding WLRK subpoena	.10
07/22/20	H. Zimmer	Confer with Herrick Sears team regarding task list, upcoming deadlines, and upcoming productions	.20
07/22/20	H. Zimmer	Confer with Aronstam re: subpoena	.20
07/22/20	H. Zimmer	Review email from Akin Gump re: meet and confer	.10
07/22/20	K. Kolb	Revise email to Girard and Robbins firms	.20
07/22/20	K. Kolb	Revise task list	.10



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07/23/20	C. Carty	Review and comment on proposed deponent list.	1.80
07/23/20	E. Plowman	Review and analyze documents in adversary proceeding	2.50
07/23/20	G. Fromer	Review and issue tag documents produced by Cyrus Defendants	4.00
07/23/20	H. Zimmer	Review Chris Carty's revisions to deponent list and confer with CC and KK on same	.20
07/23/20	H. Zimmer	Review email from Deloitte, KK, and Wilmer Hale concerning Deloitte production, and confer with KK re: same	.30
07/23/20	H. Zimmer	Review KK's revisions to STR for WLRK and confer with KK and CC re: same	.30
07/23/20	H. Zimmer	Review email from UBS re: subpoena	.10
07/23/20	H. Zimmer	Review email from Akin concerning responses and objections to joint requests for production	.20
07/23/20	K. Kolb	Analyze proposed list of deponents	.40
07/23/20	K. Kolb	Draft proposed revisions to search term parameters	.50
07/24/20	C. Carty	Correspondence related to third party discovery.	.50
07/24/20	C. Carty	Participate in call with Wachtell and Wilmer re document production (0.4); prepare for same (0.5).	.90



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07/24/20	E. Plowman	Review and analyze documents in adversary proceeding	1.40
07/24/20	H. Zimmer	Review email from Ross Aronstam concerning production, confer with KK on same, and confer with H5 on same	.40
07/24/20	H. Zimmer	Review Akin's deponent list, draft list of changes and revisions to same, confer with KK and CC on same, and send same to Akin	.90
07/24/20	H. Zimmer	Review email from counsel for Blackstone concerning agreement for production and confer with KK on same	.30
07/24/20	H. Zimmer	Review email from UBS concerning production in response to subpoena	.10
07/24/20	H. Zimmer	Conference call with WLRK and Wilmer Hale, revise notes on topics discussed, confer with KK and CC regarding hit reports,	1.40
07/24/20	K. Kolb	Revise deponent list	.20
07/24/20	K. Kolb	Prepare for and attend call with Wachtell	1.00
07/24/20	K. Kolb	Finalize parameters with Blackstone	.20
07/24/20	K. Kolb	Draft revised list of Wachtell search term parameters	.80
07/24/20	K. Kolb	Revisions to memo regarding choice of law of potential additional claims	2.20



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07/25/20	K. Kolb	Analyze hot documents produced by Cyrus	.30
07/26/20	H. Zimmer	Review documents produced in adversary proceeding	1.90
07/26/20	H. Zimmer	Confer with KK regarding third-party discovery and review revisions to memorandum on research for potential claims	.30
07/26/20	K. Kolb	Analyze hot documents produced by Cyrus	.50
07/26/20	K. Kolb	Revise research memo on choice of law issues	2.00
07/27/20	E. Plowman	Review and analyze documents in adversary proceeding	3.60
07/27/20	H. Zimmer	Confer with KK and CC regarding Girard Robbins	.20
07/27/20	H. Zimmer	Confer with KK and CC re: discovery on Ross Aronstam	.20
07/27/20	H. Zimmer	Confer with H5 re: Deloitte subpoena	.10
07/27/20	K. Kolb	Email with opposing counsel regarding privilege waiver	.40
07/27/20	K. Kolb	Review key documents related to Related Party Financing participants	.20
07/28/20	H. Zimmer	Review documents produced in adversary proceeding	.50
07/28/20	H. Zimmer	Confer with KK re: discovery productions	.20



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07/28/20	H. Zimmer	Confer with KK and CC re: document productions, review emails from H5 concerning discovery productions, email Herrick team concerning discovery,	.70
07/28/20	H. Zimmer	Review documents produced in adversary proceeding	1.10
07/28/20	H. Zimmer	Review motion to dismiss	.80
07/28/20	K. Kolb	Draft review protocol for Deloitte production	1.10
07/28/20	K. Kolb	Analyze documents produced by Cyrus	.10
07/28/20	L. Schepp	Update hot docs charts and Relativity coding in preparation for attorney review.	2.40
07/28/20	L. Schepp	Compile citations in Cyrus Motion to Dismiss briefing in preparation for attorney review.	1.10
07/29/20	E. Plowman	Review and analyze documents in adversary proceeding	2.10
07/29/20	G. Fromer	Review and issue tag documents produced by Cyrus Defendants	2.70
07/29/20	H. Zimmer	Confer with KK re: deposition conference	.10
07/29/20	H. Zimmer	Revise task list and confer with KK on same	.40
07/29/20	H. Zimmer	Confer with KK on Blackstone and review email from WilmerHale	.10



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07/29/20	H. Zimmer	Confer with KK and CC on discovery, review task list, and conduct review of documents produced on adversary proceeding	1.00
07/29/20	K. Kolb	Revise task list and discuss first level review issues with H. Zimmer	.20
07/30/20	E. Plowman	Review and analyze documents in adversary proceeding	2.30
07/30/20	G. Fromer	Review and issue tag documents produced by Cyrus Defendants	2.20
07/30/20	H. Zimmer	Confer with KK and H5 re: Blackstone production	.20
07/30/20	H. Zimmer	Review emails from KK regarding oral argument preparation	.10
07/30/20	H. Zimmer	Confer with KK and EP on oral argument prep	.20
07/30/20	H. Zimmer	Review documents produced in adversary proceeding, notes from Fromer on Cyrus review	.90
07/30/20	H. Zimmer	Review documents produced in adversary proceeding	3.10
07/30/20	K. Kolb	Call to discuss oral argument preparation	.40
07/30/20	K. Kolb	Analyze summary of Cyrus production and analyze underlying key documents	.50
07/30/20	K. Kolb	Attend to processing of Blackstone production	.20
07/30/20	K. Kolb	Analyze letter to court regarding oral argument	.30



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07/30/20	K. Kolb	Analyze motion to dismiss briefing for oral argument preparation	.30
07/30/20	L. Schepp	Compile legal cites in Cyrus Motion to Dismiss briefing for attorney review	6.80
07/31/20	E. Plowman	Review and analyze documents in adversary proceeding	3.20
07/31/20	G. Fromer	Revise memorandum on potential causes of action	.40
07/31/20	H. Zimmer	Confer with KK and CC re: discovery	.30
07/31/20	H. Zimmer	Meet and confer with defendants concerning deposition list and finalize notes to KK on same	1.00
07/31/20	H. Zimmer	Review WLRK email chronology and draft email to WLRK concerning belated production, confer with CC and KK on same	.40
07/31/20	H. Zimmer	Review documents produced in adversary proceeding, draft Cyrus Chronology, update working document concerning chronology and review procedures	1.80
07/31/20	H. Zimmer	Review Cyrus reply	.20
07/31/20	H. Zimmer	Confer with H5 concerning document review	.70
07/31/20	H. Zimmer	Review emails from WLRK, responses and objections and confer with KK on same	.70



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07/31/20	H. Zimmer	Review notes from review of documents produced in adversary proceeding	.50
07/31/20	H. Zimmer	Review email from Deloitte	.10
07/31/20	H. Zimmer	Confer with LS and KK re: document production	.20
07/31/20	H. Zimmer	Confer with H5 and KK re: Deloitte production	.10
07/31/20	K. Kolb	Analyze documents produced by Deloitte	.50
07/31/20	K. Kolb	Discuss Deloitte production and related first-level review issues with L. Schepp	.30
07/31/20	K. Kolb	Prepare for attend meet and confer regarding deponent lists	.90
07/31/20	K. Kolb	Call and analysis regarding Deloitte production	1.00
07/31/20	L. Schepp	Revise index an compile cases cited in Cyrus Motion to Dismiss motions in preparation or attorney review.	1.30
07/31/20	L. Schepp	Run various searches for WLRK comments Deloitte document production for attorney review	4.80

Total **\$112,293.00**



Re: **Jointly Asserted Causes of Action**

Bill Number: 358158
File Number: 19609-0002
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	25.00	785.00	19,625.00
K. Kolb	40.10	610.00	24,461.00
H. Zimmer	65.50	435.00	28,492.50
E. Plowman	28.90	420.00	12,138.00
G. Fromer	23.90	420.00	10,038.00
L. Schepp	49.60	335.00	16,616.00
S. O'Donnell	.90	1025.00	922.50

DISBURSEMENTS

Shipping	119.84
Online Research	1,835.79
Pacer Charges	129.10
Duplication	16.74

Total disbursements	\$2,101.47
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Re: **Jointly Asserted Causes of Action**

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TASK BILLING SUMMARY

	<u>Hours</u>	<u>Amount</u>
-		
	233.90	\$112,293.00
Subtotals	233.90	\$112,293.00



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

October 22, 2020
Invoice Number: 538312
Matter Number: 19609.0002

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through September 30, 2020	\$327,680.50
Expenses posted through September 30, 2020	3,117.42
TOTAL	<u>\$330,797.92</u>
Unpaid balance from previous invoice(s)	\$595,448.74
Total Due Now	\$926,246.66

Kindly return this page with your check payment to:
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS

HERRICK, FEINSTEIN LLP • Two Park Avenue • New York, NY 10016 • Phone: 212.592.1400 • Fax: 212.592.1500



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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
08/01/20	K. Kolb	B190	Analyze documents produced by Deloitte	0.70
08/01/20	K. Kolb	B190	Revise Deloitte review protocol	0.90
08/01/20	H. Zimmer	B190	Confer with Kyle Kolb on production from WLRK	0.10
08/02/20	K. Kolb	B190	Analyze prior briefs in connection with oral argument preparation	1.20
08/02/20	H. Zimmer	B190	Email h5 in connection with WLRK's production of documents	0.10
08/03/20	C. Carty	B190	Analyze issues related to third party discovery in adversary proceeding.	1.70
08/03/20	K. Kolb	B190	Analyze email from vendor regarding analytics	0.20
08/03/20	K. Kolb	B190	Revise oral argument prep document	0.20
08/03/20	E. Plowman	B190	Draft oral argument outline for the Cyrus Defendants' motion to dismiss	3.70
08/03/20	R. Quigley	B190	Review case background materials	1.20
08/03/20	R. Quigley	B190	Research bankruptcy code provisions and draft memorandum for team re: the same	6.00
08/03/20	H. Zimmer	B190	Confer with h5 on document production from WLRK and document review in connection with documents produced in adversary proceeding	0.30
08/03/20	H. Zimmer	B190	Confer with LS and KK regarding preparation for oral arguments on motion to dismiss	0.20
08/03/20	H. Zimmer	B190	Confer with KK and CC regarding discovery	0.10
08/03/20	H. Zimmer	B190	Review documents produced in adversary proceeding	1.00
08/03/20	L. Schepp	B190	Continue to compile cases and authority cited in Cyrus Motion to Dismiss briefing in preparation for oral argument; review of Deloitte document production to identify ways of streamlining attorney subject matter review of production.	5.70
08/04/20	C. Carty	B190	Call with litigation team regarding open tasks in connection with prepetition transfer adversary proceeding and prepare for same.	1.80
08/04/20	K. Kolb	B190	Strategize regarding pending discovery issues with C. Carty and H. Zimmer	0.60
08/04/20	K. Kolb	B190	Attend to first level review issues and meet and confer progress	0.30
08/04/20	E. Plowman	B190	Review motion to dismiss briefing to prepare outline for oral argument on motion to dismiss	1.80
08/04/20	E. Plowman	B190	Draft outline for oral argument on Cyrus MTD	2.70



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
08/04/20	H. Zimmer	B190	Confer with Kyle Kolb and Linda Schepp on documents produced in adversary proceeding, and confer with Conor Anderson on same	0.20
08/04/20	H. Zimmer	B190	Confer with KK and LS concerning oral arguments on motion to dismiss and prep for same	0.10
08/04/20	H. Zimmer	B190	Email counsel to UBS concerning subpoena	0.10
08/04/20	L. Schepp	B190	Compile additional documents for attorney preparation for Cyrus Motion to Dismiss argument.	2.70
08/04/20	L. Schepp	B190	Continued review of Deloitte document production.	1.20
08/05/20	C. Carty	B190	Prepare for oral argument on Cyrus motion to dismiss prepetition transfer adversary proceeding.	1.50
08/05/20	J. D'Angelo	B190	Emails re: Cyrus document production review.	0.10
08/05/20	K. Kolb	B190	Discuss Blackstone production background with C. Anderson and H. Zimmer	0.30
08/05/20	K. Kolb	B190	Analyze summary of RPT production	0.40
08/05/20	K. Kolb	B190	Draft argument for oral argument	1.90
08/05/20	K. Kolb	B190	Analyze documents produced by Wachtell and Deloitte	0.50
08/05/20	C. Anderson	B190	Confer with K. Kolb and H. Zimmer re: document production and review and case background	0.20
08/05/20	C. Anderson	B190	Review background case materials, briefings and complaint	1.20
08/05/20	R. Quigley	B190	Review materials for document review and case background materials	5.00
08/05/20	H. Zimmer	B190	Conference call with Akin concerning review of documents produced in adversary proceeding	0.50
08/05/20	H. Zimmer	B190	Confer with KK and CC regarding document review	0.10
08/05/20	H. Zimmer	B190	Confer with KK and LS on document review	0.10
08/05/20	H. Zimmer	B190	Confer with KK and LS on oral argument prep for motion to dismiss	0.30
08/05/20	H. Zimmer	B190	Confer with H5, KK, and LS concerning documents produced in adversary proceeding	0.20
08/05/20	H. Zimmer	B190	Confer with Conor Anderson re: review of documents produced in adversary proceeding	0.10
08/05/20	H. Zimmer	B190	Confer with LS and KK regarding documents produced in adversary proceeding	0.30
08/05/20	H. Zimmer	B190	Confer with KK and CA regarding review of documents produced in adversary proceeding	0.10
08/05/20	H. Zimmer	B190	Confer with h5 concerning document productions	0.10
08/05/20	H. Zimmer	B190	Conference call with Conor Anderson on review of documents produced in adversary proceeding	0.10
08/05/20	H. Zimmer	B190	Conference call with UBS on UBS' response to subpoena	0.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
08/05/20	H. Zimmer	B190	Confer with Chris Carty on UBS' response to subpoena	0.20
08/05/20	L. Schepp	B190	Review and index SDIR document production for Aronstam related documents for attorney review.	4.30
08/05/20	L. Schepp	B190	Compile document related to Cyrus Motion to Dismiss for attorney review prior to oral argument.	1.10
08/06/20	C. Carty	B190	Participate in call with co-counsel re review of new productions and prepare for same.	1.00
08/06/20	C. Carty	B190	Prepare for oral argument on Cyrus motion to dismiss.	2.30
08/06/20	C. Carty	B190	Analyze issues related to third party discovery in connection with prepetition transfer adversary proceeding.	1.20
08/06/20	K. Kolb	B190	Analyze documents produced by Deloitte	0.30
08/06/20	K. Kolb	B190	Summarize and analyze issue related to RPT Subcommittee privilege	0.30
08/06/20	K. Kolb	B190	Attend call with Akin to discuss first level review plan for Deloitte and Wachtell productions	0.50
08/06/20	C. Anderson	B190	Review and analyze background case information, document review breakdown and briefings and complaint	1.40
08/06/20	C. Anderson	B190	Review Blackstone document production for relevant document and possible issues	0.90
08/06/20	E. Plowman	B190	Review cases cited in motion to dismiss briefing for oral argument outline	3.70
08/06/20	H. Zimmer	B190	Conference call with Akin concerning documents produced in adversary proceeding and confer with CC and KK on same	0.70
08/06/20	H. Zimmer	B190	Confer with KK on production of documents produced in adversary proceeding	0.10
08/06/20	H. Zimmer	B190	Confer with LS and KK concerning documents produced by third parties in adversary proceeding and review documents produced	0.30
08/06/20	H. Zimmer	B190	Confer with KK and CC concerning documents produced by third parties in connection with adversary proceeding	0.10
08/06/20	H. Zimmer	B190	Review documents produced in adversary proceeding and confer with Conor Anderson on same	0.20
08/06/20	H. Zimmer	B190	Confer with Akin concerning discovery	0.10
08/06/20	H. Zimmer	B190	Confer with H5 in connection with documents produced in adversary proceeding	0.10
08/06/20	H. Zimmer	B190	Review documents produced in adversary proceeding	0.50
08/06/20	L. Schepp	B190	Compile examples of SDIR documents cited in index for attorney review.	1.70
08/07/20	C. Carty	B190	Review and analyze briefing in connection with Cyrus	1.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			motion to dismiss.	
08/07/20	J. D'Angelo	B190	Review e-mail and Akin first level review protocol memos.	0.50
08/07/20	K. Kolb	B190	Analyze Akin first level review protocol memos	0.90
08/07/20	K. Kolb	B190	Draft outline and analyze cases for oral argument preparation	4.00
08/07/20	C. Anderson	B190	Review Blackstone documents production for relevant documents and possible issues	2.40
08/07/20	E. Plowman	B190	Review motion to dismiss briefing to prepare oral argument outline	3.60
08/07/20	E. Plowman	B190	Draft outline for oral argument on motion to dismiss	2.40
08/07/20	H. Zimmer	B190	Confer with KK on review of documents produced in adversary proceeding	0.10
08/07/20	H. Zimmer	B190	Review discovery memoranda from Akin	0.90
08/07/20	H. Zimmer	B190	Review discovery stipulations from Akin	0.30
08/10/20	J. D'Angelo	B190	High level review of compilation of documents, exhibits and caselaw relevant to Cyrus Defendants' motion to dismiss.	0.70
08/10/20	S. O'Donnell	B190	Oral argument prep.	2.00
08/10/20	K. Kolb	B190	Analyze draft stipulation regarding remote depositions	0.20
08/10/20	K. Kolb	B190	Draft and discuss proposed plan for review of Deloitte and WLRK productions	0.30
08/10/20	K. Kolb	B190	Draft outline for oral argument and analyze cases relied upon in connection with same	6.30
08/10/20	C. Anderson	B190	Review document production for Blackstone and summarize general findings	0.10
08/10/20	E. Plowman	B190	Review document review memos to prepare for document review	1.20
08/10/20	E. Plowman	B190	Review motion to dismiss briefing for oral argument outline on motion to dismiss	3.60
08/10/20	E. Plowman	B190	Draft outline for oral argument on motion to dismiss	2.40
08/10/20	H. Zimmer	B190	Confer with CC and KK on stipulations from akin	0.20
08/10/20	H. Zimmer	B190	Confer with Conor Anderson on documents produced in adversary proceeding and summary on same	0.30
08/10/20	H. Zimmer	B190	Email Dean Chapman concerning deposition stipulation	0.10
08/10/20	H. Zimmer	B190	Analyze papers submitted in connection with motion to dismiss, including Akin Brief, Cyrus Moving Brief and Reply, and Herrick's opposition, and draft portion of outline of oral argument	1.50
08/10/20	H. Zimmer	B190	Confer with Akin and WilmerHale on motion to dismiss	0.10
08/10/20	H. Zimmer	B190	Review Elizabeth Plowman's outline for oral argument	0.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			on unjust enrichment claim	
08/10/20	H. Zimmer	B190	Review finalized outline for oral argument from KK on motion to dismiss	0.70
08/10/20	H. Zimmer	B190	Confer with KK and CC on review of documents produced in adversary proceeding	0.10
08/10/20	H. Zimmer	B190	Confer with H5 and Akin concerning review of documents produced in adversary proceeding	0.20
08/11/20	C. Carty	B190	Prepare for oral argument on Cyrus motion to dismiss.	1.60
08/11/20	J. D'Angelo	B190	Emails re: oral argument and final Transform Document Sharing Stipulation.	0.30
08/11/20	K. Kolb	B190	Revise oral argument outline	1.00
08/11/20	K. Kolb	B190	Draft review protocol addendum regarding Deloitte and WLRK productions	2.30
08/11/20	D. Field	B190	Discuss review of documents produced in adversary proceeding	0.10
08/11/20	E. Plowman	B190	Review oral argument outline for motion to dismiss	0.70
08/11/20	H. Zimmer	B190	Confer with Dan Field on documents produced in adversary proceeding	0.10
08/11/20	H. Zimmer	B190	Review task list and confer with KK and CC on open items on discovery	0.30
08/11/20	H. Zimmer	B190	Confer with KK on oral argument on motion to dismiss	0.10
08/11/20	H. Zimmer	B190	Confer with KK and CC on oral argument on motion to dismiss	0.10
08/11/20	H. Zimmer	B190	Confer with KK and EP on oral argument strategy	0.10
08/11/20	H. Zimmer	B190	Review email from Elizabeth Plowman in connection with review of documents produced in adversary proceeding and oral argument	0.20
08/11/20	H. Zimmer	B190	Review email from KK on documents produced in adversary proceeding and strategy going forward	0.20
08/11/20	H. Zimmer	B190	Review email from Akin concerning stipulation and review same	0.30
08/11/20	H. Zimmer	B190	Review email from CC to Akin concerning oral argument on motion to dismiss	0.10
08/11/20	H. Zimmer	B190	Revise review memoranda	0.20
08/12/20	C. Carty	B190	Revise search terms to Wachtell in connection with prepetition transfer adversary proceeding (1.3); revise search parameters for other recipients of third party discovery (0.8); attention to third party discovery (0.6).	2.70
08/12/20	K. Kolb	B190	Review summary of Blackstone document production	0.40
08/12/20	K. Kolb	B190	Emails regarding oral argument logistics and Transform production stipulation	0.20
08/12/20	C. Anderson	B190	Review Blackstone document production and summarize	2.00



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			relevant documents and analysis	
08/12/20	C. Anderson	B190	Draft emails re: Blackstone production review	0.10
08/12/20	H. Zimmer	B190	Review emails from KK to Wilmer Hale in connection with oral argument and Akin in connection with stipulation for discovery	0.10
08/12/20	H. Zimmer	B190	Review email from Wilmer Hale on oral argument for motion to dismiss	0.10
08/12/20	H. Zimmer	B190	Review Conor Anderson's summary on documents produced in adversary proceeding and confer with CA and KK on same	0.70
08/12/20	H. Zimmer	B190	Review email from Judge Drain's chambers in connection with hearing on motion to dismiss	0.10
08/12/20	H. Zimmer	B190	Review email from CC on oral argument for motion to dismiss	0.10
08/12/20	H. Zimmer	B190	Review edits from CC on hit reports produced by WLRK in connection with subpoena and confer with CC on same	0.20
08/12/20	H. Zimmer	B190	Review and revise task list	0.30
08/12/20	H. Zimmer	B190	Review documents produced in adversary proceeding	0.50
08/12/20	L. Schepp	B190	Identify native file for C. Anderson in Blackstone production for further attorney review.	0.50
08/13/20	C. Carty	B190	Prepare for oral argument on Cyrus motion to dismiss.	1.30
08/13/20	S. O'Donnell	B190	Prepare for oral argument on Cyrus motion to dismiss.	2.00
08/13/20	K. Kolb	B190	Revise search parameters	0.20
08/13/20	K. Kolb	B190	Discuss case background and discovery projects with M. Calb	1.20
08/13/20	K. Kolb	B190	Revise memo regarding first level review process	0.70
08/13/20	K. Kolb	B190	Revise Girard search parameters	0.20
08/13/20	K. Kolb	B190	Analyze documents produced by Deloitte	0.40
08/13/20	M. Calb	B190	Call with K. Kolb to discuss case background (0.7); review amended complaint (1.7); review Wachtell liability memo (0.3); review scheduling order (0.2); review doc review memos (0.5); review papers on motions to dismiss and chart summarizing same (1.3).	4.30
08/13/20	H. Zimmer	B190	Review documents produced in adversary proceeding	1.60
08/13/20	H. Zimmer	B190	Revise memoranda on review for documents produced in adversary proceeding	0.20
08/13/20	H. Zimmer	B190	Confer with KK on CC's revisions to WLRK hit reports in connection with producing documents in response to subpoena	0.10
08/13/20	H. Zimmer	B190	Review KK's addendum to contract attorneys in connection with review of documents produced in	0.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			adversary proceeding and confer with KK on same	
08/13/20	H. Zimmer	B190	Confer with CC on motion to dismiss	0.10
08/13/20	H. Zimmer	B190	Draft parameters for Robbins LLP, revise parameters for Girard Sharp, and confer with CC on same	0.80
08/13/20	H. Zimmer	B190	Revise memoranda on documents produced in adversary proceeding and case strategy	0.20
08/13/20	H. Zimmer	B190	Review emails from KK to h5 in connection with documents produced in adversary proceeding	0.10
08/13/20	H. Zimmer	B190	Review email from counsel for UBS in connection with UBS's production of documents in response to subpoena	0.20
08/13/20	L. Schepp	B190	Update document production index.	2.30
08/14/20	S. O'Donnell	B190	Prep for oral argument; zoom/court testing.	2.00
08/14/20	K. Kolb	B190	Analyze additional documents produced by Cyrus	2.40
08/14/20	K. Kolb	B190	Additional research for oral argument	2.20
08/14/20	C. Anderson	B190	Draft emails re: document review and status	0.10
08/14/20	M. Calb	B190	Review discovery documents including request, responses and objections, initial disclosures, and correspondence re scope and productions.	1.00
08/14/20	H. Zimmer	B190	Confer with Conor Anderson on review of documents produced in adversary proceeding	0.20
08/14/20	H. Zimmer	B190	Appearing on zoom to test oral argument before Judge Drain's chambers	0.40
08/14/20	H. Zimmer	B190	Confer with CC on notes from test with Judge Drain's chambers	0.10
08/14/20	H. Zimmer	B190	Confer with KK and MC on call re: Sears background and strategy	0.10
08/14/20	H. Zimmer	B190	Review email from Deloitte in connection with Deloitte's production of documents in response to subpoena	0.10
08/16/20	K. Kolb	B190	Analyze and second-level review documents produced by Cyrus	3.10
08/17/20	C. Carty	B190	Prepare for motion to dismiss oral arguments in connection with adversary proceeding.	0.50
08/17/20	J. D'Angelo	B190	E-mail re: oral argument prep; review outline.	0.40
08/17/20	S. O'Donnell	B190	Argument prep.	1.50
08/17/20	K. Kolb	B190	Call regarding oral argument preparation	0.30
08/17/20	K. Kolb	B190	Plan and prepare for first level review of Deloitte and Wachtell productions	0.70
08/17/20	K. Kolb	B190	Email to Deloitte regarding privilege log	0.10
08/17/20	K. Kolb	B190	Discuss pending discovery issues with M. Calb and H. Zimmer	1.30
08/17/20	K. Kolb	B190	Revise oral argument outline	1.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
08/17/20	K. Kolb	B190	Analyze cases for oral argument preparation	1.00
08/17/20	C. Anderson	B190	Review and analyze Greenlight appraisals and property valuations and related document production	4.10
08/17/20	C. Anderson	B190	Revise summary of relevant Blackstone document productions	0.40
08/17/20	C. Anderson	B190	Review Cushman appraisals and valuation tables for relevant methodology and valuations against Greenlight appraisals	1.10
08/17/20	M. Calb	B190	Calls and correspondence with K. Kolb and H. Zimmer re motion practice, document review, discovery, legal research and scheduling.	1.20
08/17/20	M. Calb	B190	Review Deloitte documents.	3.50
08/17/20	M. Calb	B190	Review working doc describing productions, subpoenas, and review tasks.	0.40
08/17/20	M. Calb	B190	Review hot docs from Wachtell production and summary of same.	1.20
08/17/20	G. Fromer	B190	Review documents produced by Cyrus Defendants	0.10
08/17/20	G. Fromer	B190	Review email analysis from Kyle Kolb regarding Cyrus document review next steps and analyze potential new allegations	0.30
08/17/20	G. Fromer	B190	Review Cyrus Motion to Dismiss	0.60
08/17/20	E. Plowman	B190	Call with other Herrick attorneys re oral argument on motions to dismiss	0.20
08/17/20	E. Plowman	B190	Review case law re collapsing transfers for fraudulent conveyance claims for response to argument that no knowledge of the scheme was alleged	4.50
08/17/20	E. Plowman	B190	Summarize cases in the Cyrus motion to dismiss briefing to prepare for oral argument	2.30
08/17/20	H. Zimmer	B190	Review outline for oral argument and confer with KK on same	0.50
08/17/20	H. Zimmer	B190	Confer with KK and MA concerning case overview and primary documents utilized in case	0.10
08/17/20	H. Zimmer	B190	Review email from counsel to Deloitte concerning production	0.10
08/17/20	H. Zimmer	B190	Confer with KK and EP on oral argument	0.20
08/17/20	H. Zimmer	B190	Confer with MC and KK concerning review of documents produced in adversary proceeding	0.20
08/17/20	H. Zimmer	B190	Review emails between Herrick and Akin concerning first level review of documents produced in adversary proceeding	0.10
08/17/20	H. Zimmer	B190	Confer with Conor Anderson concerning review of documents produced in adversary proceeding and	0.80



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			review summary on same	
08/17/20	H. Zimmer	B190	Conference call with KK and MC regarding overview, analysis, and strategy of case	0.90
08/17/20	H. Zimmer	B190	Conf. call with KK concerning strategy and review of documents produced in adversary proceeding	0.30
08/17/20	H. Zimmer	B190	Conference call with MC concerning documents produced in adversary proceeding	0.40
08/17/20	H. Zimmer	B190	Review documents produced in adversary proceeding	0.30
08/17/20	L. Schepp	B190	Check Cyrus production documents cited in oral argument outline, per K. Kolb.	1.90
08/18/20	C. Carty	B190	Prepare for oral argument on motions to dismiss (3.2); review and analyze case law cited in motions to dismiss (2.4, 2.5).	8.10
08/18/20	J. D'Angelo	B190	Emails re: oral argument, outline and exhibits re: same.	0.30
08/18/20	S. O'Donnell	B190	Oral argument prep.	2.00
08/18/20	K. Kolb	B190	Draft and revise case summaries for oral argument	2.10
08/18/20	K. Kolb	B190	Review documents in connection with Blackstone review and related issues	0.80
08/18/20	K. Kolb	B190	Analyze documents produced by Deloitte in connection with planning for first level review	0.40
08/18/20	K. Kolb	B190	Discuss Blackstone production and related issues with H. Zimmer and C. Anderson	0.30
08/18/20	C. Anderson	B190	Confer internally re: Greenlight appraisals compared to Cushman appraisals	0.20
08/18/20	C. Anderson	B190	Confer internally re: Deloitte research	0.50
08/18/20	M. Calb	B190	Correspondence re oral argument on MTD.	0.20
08/18/20	M. Calb	B190	Call and correspondence with case team re Deloitte research assignment.	0.80
08/18/20	M. Calb	B190	Review internal memo re Wachtell and case law cited therein.	1.30
08/18/20	M. Calb	B190	Review RLF production summary.	0.50
08/18/20	M. Calb	B190	Review documents supporting going concern allegation in FAC re Deloitte.	0.60
08/18/20	G. Fromer	B190	Reply to Kyle Kolb's email on Cyrus document review strategy	0.10
08/18/20	E. Plowman	B190	Review/summarize cases for oral argument on Cyrus motion to dismiss	5.30
08/18/20	H. Zimmer	B190	Review papers for oral arguments before Judge Drain on motion to dismiss, including cases and exhibits sent by Akin, draft write-up on cases utilized in papers, and confer with KK on same	4.70
08/18/20	H. Zimmer	B190	Review email from chambers concerning oral argument	0.10



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
08/18/20	H. Zimmer	B190	Conference call with KK and CA concerning Blackstone documents	0.30
08/18/20	H. Zimmer	B190	Review documents produced in adversary proceeding	0.40
08/18/20	L. Schepp	B190	Check citations in oral argument regarding Cyrus documents.	0.80
08/19/20	C. Carty	B190	Attend oral argument on motions to dismiss in adversary proceeding and prepare for same.	8.20
08/19/20	J. D'Angelo	B190	E-mail re: oral argument.	0.30
08/19/20	S. O'Donnell	B190	Prep and attend hearing.	4.50
08/19/20	K. Kolb	B190	Attend oral argument on motion to dismiss	1.50
08/19/20	K. Kolb	B190	Revise oral argument outline	1.50
08/19/20	K. Kolb	B190	Analyze documents produced by Deloitte	0.30
08/19/20	C. Anderson	B190	Review Deloitte related memos and contracts related to cause of action research	0.40
08/19/20	M. Calb	B190	Review additional Deloitte documents from production.	0.30
08/19/20	E. Plowman	B190	Review/summarize cases for oral argument on Cyrus motion to dismiss	5.80
08/19/20	E. Plowman	B190	Research re Illinois versus NY's voluntary payment doctrine	1.60
08/19/20	H. Zimmer	B190	Attend oral arguments on motion to dismiss before Judge Drain	7.50
08/19/20	H. Zimmer	B190	Confer with KK and EP concerning motion to dismiss	0.20
08/20/20	C. Carty	B190	Prepare for oral argument on motions to dismiss (4.2); review and analyze case law cited in motions to dismiss (3.4).	7.60
08/20/20	K. Kolb	B190	Revise oral argument outline	1.00
08/20/20	K. Kolb	B190	Email regarding first level review of third party productions	0.30
08/20/20	E. Plowman	B190	Research re Illinois voluntary payment doctrine for oral argument on Cyrus motion to dismiss	1.10
08/20/20	H. Zimmer	B190	Confer with CC and Akin concerning subpoena on UBS and research on expenses	1.00
08/20/20	H. Zimmer	B190	Review updates to oral argument outline	0.20
08/20/20	H. Zimmer	B190	Review email from Deloitte concerning privilege log	0.10
08/20/20	H. Zimmer	B190	Review email from Akin concerning first level review of documents and confer with KK and H5 concerning same	0.30
08/20/20	H. Zimmer	B190	Confer with EP and KK concerning motion to dismiss	0.30
08/20/20	H. Zimmer	B190	Confer with KK and CC on third party discovery	0.40
08/21/20	C. Carty	B190	Prepare for oral argument on motions to dismiss (3.3, 1.9); review and analyze case law cited in motions to dismiss (2.8).	8.00



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08/21/20	S. O'Donnell	B190	Argument prep; review Cyrus docs.	2.50
08/21/20	K. Kolb	B190	Confer with counsel for Deloitte regarding privilege log	0.20
08/21/20	K. Kolb	B190	Revise review addendum	0.30
08/21/20	M. Calb	B190	Correspondence re Deloitte research (0.2); review key agreements and engagement letters (0.5).	0.70
08/21/20	H. Zimmer	B190	Review documents produced in adversary proceeding	1.30
08/21/20	H. Zimmer	B190	Review document, revise memoranda on case strategy, review communications with third party discovery, review privilege log draft protocol	1.40
08/21/20	H. Zimmer	B190	Review privilege log sent by Deloitte and confer with KK on same	0.40
08/21/20	H. Zimmer	B190	Conference call with Deloitte and Wilmer Hale concerning privilege log	0.20
08/22/20	C. Carty	B190	Review and analyze documents submitted by Cyrus in connection with motions to dismiss oral argument.	1.20
08/22/20	S. O'Donnell	B190	Argument prep.	2.00
08/22/20	K. Kolb	B190	Analyze privilege log provided by third party	0.20
08/22/20	H. Zimmer	B190	Review documents produced in adversary proceeding	0.30
08/23/20	C. Carty	B190	Prepare for oral argument on motions to dismiss.	5.60
08/23/20	S. O'Donnell	B190	Prepare for oral argument	2.00
08/24/20	C. Carty	B190	Prepare for oral argument on motions to dismiss (4.1, 2.5); review and analyze case law cited in motions to dismiss (3.5, 1.2).	11.30
08/24/20	S. O'Donnell	B190	Prepare for oral argument	2.00
08/24/20	K. Kolb	B190	Analyze revisions to oral argument outline	0.40
08/24/20	K. Kolb	B190	Further research for oral argument	0.50
08/24/20	K. Kolb	B190	Email regarding protocol for review	0.20
08/24/20	K. Kolb	B190	Analyze Deloitte documents and plan for review	0.30
08/24/20	M. Calb	B190	Correspondence re Deloitte review.	0.20
08/24/20	H. Zimmer	B190	Review finalized outline for Herrick's argument on opposition to Cyrus' motion to dismiss in anticipation of August 25 hearing before Judge Drain	0.50
08/24/20	H. Zimmer	B190	Confer with Laini John on hearing before Judge Drain	0.10
08/24/20	H. Zimmer	B190	Review document sent by Russell Collins at Akin Gump concerning documents produced in adversary proceeding; and review binder from Cyrus	0.80
08/24/20	H. Zimmer	B190	Review email from Judge Drain's chambers concerning hearing for August 25	0.10
08/24/20	H. Zimmer	B190	Confer with KK and CC on argument for opposition to motion to dismiss by Cyrus	0.40
08/24/20	H. Zimmer	B190	Review documents produced in adversary proceeding	0.50



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			and revise research memoranda on second level review	
08/24/20	L. Schepp	B190	Compile documents for reference by C. Carty during oral argument.	0.80
08/25/20	C. Carty	B190	Prepare for oral argument on motions to dismiss (2.1); attend oral argument on motions to dismiss (7.5).	9.60
08/25/20	S. O'Donnell	B190	Prep and attend hearing.	8.50
08/25/20	K. Kolb	B190	Analyze Deloitte internal memo	0.50
08/25/20	K. Kolb	B190	Analyze Deloitte privilege log information	0.60
08/25/20	K. Kolb	B190	Draft further case summaries in connection with oral argument	1.10
08/25/20	K. Kolb	B190	Attend oral argument	2.50
08/25/20	C. Anderson	B190	Review contracts and going concern memos from Deloitte for possible causes of action	0.20
08/25/20	C. Anderson	B190	Review relevant articles and case law on auditor liability and causes of action	1.20
08/25/20	C. Anderson	B190	Research and analyze case law and causes of action for liability of auditor/accountant	0.60
08/25/20	C. Anderson	B190	Research and analyze case law and causes of action for liability of auditor/accountant	1.70
08/25/20	C. Anderson	B190	Confer with M. Calb on possible causes of action and research in auditor liability	0.30
08/25/20	M. Calb	B190	Review auditor engagement letters (0.3); call re Deloitte research preliminary findings (0.5); review case law re auditor standard of care (1.1).	1.90
08/25/20	H. Zimmer	B190	Attend oral arguments on motion to dismiss before Judge Drain via zoom	6.70
08/25/20	H. Zimmer	B190	Confer with Sean O'Donnell and Kyle Kolb in connection with oral arguments on motion to dismiss before Judge Drain	0.10
08/26/20	C. Anderson	B190	Analyze and summarize Greenlight appraisals from Blackstone document production	3.70
08/26/20	H. Zimmer	B190	Review email from counsel to Deloitte concerning privilege log	0.10
08/27/20	C. Carty	B190	Prepare for oral argument on motions to dismiss adversary proceeding.	3.50
08/27/20	C. Anderson	B190	Revise Blackstone Doc Production Summary and draft related emails	0.60
08/27/20	M. Calb	B190	Review Deloitte Seritage transaction risk assessment memo and associated correspondence.	0.90
08/28/20	C. Carty	B190	Prepare for oral argument on motions to dismiss adversary proceeding.	4.50
08/28/20	S. O'Donnell	B190	Prepare for oral argument on motion to dismiss	1.00



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			adversary proceeding.	
08/28/20	K. Kolb	B190	Respond to inquiries regarding scope of research assignments	0.30
08/28/20	K. Kolb	B190	Review research summary regarding scope of privilege	0.20
08/28/20	K. Kolb	B190	Analyze letters to Court regarding Nine West decision	0.20
08/28/20	M. Calb	B190	Review board meeting minutes re Deloitte presentations.	1.00
08/28/20	E. Plowman	B190	Research re the PCAOB/Section 105 privilege to assess Deloitte's assertion of the privilege	4.60
08/28/20	H. Zimmer	B190	Review email from Judge Drain's chambers in connection with August 31 hearing	0.20
08/28/20	H. Zimmer	B190	Review summary from Elizabeth Plowman of research on privilege	0.40
08/28/20	H. Zimmer	B190	Review hot document from documents produced in adversary proceeding	0.20
08/29/20	H. Zimmer	B190	Review documents produced in adversary proceeding	0.40
08/30/20	C. Carty	B190	Prepare for oral argument on motions to dismiss adversary proceeding.	2.20
08/30/20	H. Zimmer	B190	Revise memoranda in connection with review of Sears claims and review	3.10
08/31/20	C. Carty	B190	Participate in oral argument hearing related to motions to dismiss adversary proceeding (3.5); prepare for same (1.0).	4.50
08/31/20	S. O'Donnell	B190	Prep and attend argument.	5.50
08/31/20	K. Kolb	B190	Analyze summary of Blackstone production	0.30
08/31/20	K. Kolb	B190	Distinguish additional cases for oral argument	0.30
08/31/20	K. Kolb	B190	Attend oral argument on motions to dismiss	3.50
08/31/20	H. Zimmer	B190	Revise memoranda on review protocol and essential claims and review documents produced in adversary proceeding	1.00
08/31/20	H. Zimmer	B190	Revise memoranda on review protocol and essential claims and review documents produced in adversary proceeding, and confer with KK and CC regarding open items on discovery	1.00
08/31/20	H. Zimmer	B190	Attend hearing before Judge Drain on day 3 of oral arguments on motion to dismiss	3.60
08/31/20	H. Zimmer	B190	Review oral argument outline in preparation for day 3 of oral argument with respect to actual and constructive fraudulent transfer	0.40
09/01/20	K. Kolb	B190	Discuss second level review process with H. Zimmer	0.20
09/01/20	C. Anderson	B190	Research Causes of Action against Auditor/Deloitte and prepare outline of research	1.80



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09/01/20	C. Anderson	B190	Review and analyze Sears/Deloitte engagement letters and tax service contracts	0.90
09/01/20	M. Calb	B190	Review docket updates.	0.30
09/01/20	H. Zimmer	B190	Confer with KK on Wachtell subpoena	0.10
09/01/20	H. Zimmer	B190	E-mail Wilmer Hale in connection with Wachtell subpoena	0.10
09/01/20	H. Zimmer	B190	Draft and revise memorandum on second level review of documents produced in adversary proceeding and confer with KK on same	3.50
09/02/20	K. Kolb	B190	Analyze Wilmer Hale revisions to search terms	0.10
09/02/20	C. Anderson	B190	Research causes of action against auditor/Deloitte and draft related summary/outline	1.70
09/02/20	M. Calb	B190	Review draft memo re auditor standard of care and case law cited therein.	2.10
09/02/20	H. Zimmer	B190	Confer with KK on conference with Akin concerning document review	0.10
09/02/20	H. Zimmer	B190	Review documents produced in adversary proceeding	1.20
09/02/20	H. Zimmer	B190	Review email from Wilmer Hale in connection with WLRK subpoena	0.10
09/02/20	H. Zimmer	B190	Confer with KK and H5 concerning documents produced in adversary proceeding	0.10
09/02/20	H. Zimmer	B190	Confer with KK and CC concerning wachtell subpoena	0.10
09/03/20	K. Kolb	B190	Discuss review process with H. Zimmer	0.20
09/03/20	H. Zimmer	B190	Confer with KK on review of documents produced in adversary proceeding	0.20
09/03/20	H. Zimmer	B190	Confer with H5 concerning review of documents produced in adversary proceeding	0.20
09/03/20	H. Zimmer	B190	Review email between KK and Akin concerning review of documents produced in adversary proceeding	0.10
09/03/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding	0.40
09/03/20	H. Zimmer	B190	Confer with KK on review of documents produced in adversary proceeding	0.30
09/04/20	K. Kolb	B190	Call with Akin regarding Deloitte and Wachtell second level review	0.30
09/04/20	K. Kolb	B190	Draft email regarding summary of second level review process	0.40
09/04/20	K. Kolb	B190	Discuss further revisions to search terms and email to opposing counsel	0.20
09/04/20	M. Calb	B190	Review updated discovery memo (0.3); correspondence with case team re same (0.2); second level review of Deloitte documents (2.5); review docket updates including motion to compel (0.3).	3.30



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09/04/20	H. Zimmer	B190	Conference call with Akin regarding process for review of documents produced in adversary proceeding	0.30
09/04/20	H. Zimmer	B190	Review documents produced in adversary proceeding	0.20
09/04/20	H. Zimmer	B190	Confer with KK, CC, LS, and h5 concerning review of documents produced in adversary proceeding and batches	0.30
09/04/20	H. Zimmer	B190	Confer with KK and CC concerning Wachtell subpoena	0.10
09/04/20	H. Zimmer	B190	Draft list of topics and assigning attorneys for document review and confer with KK on same	0.30
09/04/20	H. Zimmer	B190	Review email from Herrick to WLRK concerning Wachtell subpoena	0.10
09/04/20	H. Zimmer	B190	Confer with KK regarding review of documents produced in adversary proceeding and instructions to team regarding same, and review email from KK on same	0.60
09/04/20	H. Zimmer	B190	Review documents produced in adversary proceeding	2.70
09/04/20	H. Zimmer	B190	Revise hit report for Wachtell subpoena and send same to Kyle Kolb and confer with Kyle Kolb on same	0.20
09/08/20	K. Kolb	B190	Analyze documents regarding going concern	0.30
09/08/20	K. Kolb	B190	Analyze documents identified as hot from Deloitte production	0.70
09/08/20	M. Calb	B190	Correspondence re Deloitte research.	0.30
09/08/20	M. Calb	B190	Second level review of Deloitte documents.	2.20
09/08/20	M. Calb	B190	Review recent case filings.	0.20
09/08/20	G. Fromer	B190	Review document review assignment explanatory email from Kyle Kolb	0.40
09/08/20	R. Quigley	B190	Review documents in productions	1.40
09/08/20	H. Zimmer	B190	Confer with KK, LS, and EP concerning Deloitte privilege log	0.40
09/08/20	L. Schepp	B190	Discussion with K. Kolb regarding Deloitte privilege log review.	0.40
09/09/20	K. Kolb	B190	Analyze summary of issues relating to third party's privilege log	0.20
09/09/20	H. Zimmer	B190	Confer with KK on third party discovery	0.20
09/09/20	H. Zimmer	B190	Confer with KK and LS regarding Deloitte privilege log and documents produced in adversary proceeding	0.40
09/09/20	H. Zimmer	B190	Review documents produced in adversary proceeding	0.20
09/09/20	H. Zimmer	B190	Review email from Akin concerning privilege log stipulation and review same	0.20
09/09/20	L. Schepp	B190	Review Deloitte privilege log for attorney names and issues relating to various email subjects, per K. Kolb.	3.70
09/10/20	C. Carty	B190	Call with Akin and Wilmer regarding outstanding third	0.80



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			party discovery issues and prepare for same.	
09/10/20	R. Quigley	B190	Review documents in productions	2.10
09/10/20	H. Zimmer	B190	Conference call with Chris Carty concerning discovery	0.10
09/10/20	H. Zimmer	B190	Conference call with Akin and Wilmer Hale concerning status of third party subpoenas and finalize summary of same	0.90
09/10/20	H. Zimmer	B190	Confer with Kyle Kolb on review of discovery and review of documents produced in adversary proceeding	0.10
09/10/20	H. Zimmer	B190	Email Wilmer Hale in connection with Deloitte production	0.10
09/11/20	K. Kolb	B190	Attend to second level review	0.20
09/11/20	R. Quigley	B190	Review documents in productions	1.70
09/11/20	H. Zimmer	B190	Confer with KK, CC, and H5 concerning review of documents produced in adversary proceeding	0.10
09/13/20	H. Zimmer	B190	Confer with KK and CA regarding memorandum on review of documents produced in adversary proceeding and review memorandum on same	0.30
09/14/20	C. Carty	B190	Review and analyze documents produced in connection with third party subpoenas.	2.10
09/14/20	C. Anderson	B190	Review and revise Blackstone document production summary	1.20
09/14/20	C. Anderson	B190	Review and analyze Blackstone document production for Project Madison terms and overall structure	0.70
09/14/20	C. Anderson	B190	Participate in Deloitte research call	0.30
09/14/20	H. Zimmer	B190	Confer with KK and LS regarding review of documents produced in adversary proceeding	0.10
09/14/20	H. Zimmer	B190	Analyze email from Dean Chapman concerning stipulation	0.20
09/15/20	C. Anderson	B190	Review Blackstone document production for relevant correspondences	0.60
09/15/20	C. Anderson	B190	Revise Blackstone production summary and draft executive summary	0.30
09/15/20	G. Fromer	B190	Discuss document review with Heather Zimmer	0.10
09/15/20	R. Quigley	B190	Review documents in productions	2.30
09/16/20	C. Anderson	B190	Draft emails re: Blackstone document summary and revisions	0.10
09/16/20	R. Quigley	B190	Review documents in productions	1.80
09/16/20	H. Zimmer	B190	Review email from Conor Anderson concerning Blackstone production in response to subpoena	0.20
09/16/20	H. Zimmer	B190	Confer with KK concerning discovery and case status	0.10
09/16/20	H. Zimmer	B190	Revise task list and confer with CC and KK on same	0.50



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09/17/20	C. Carty	B190	Call with K. Kolb and H. Zimmer re third party discovery and prepare for same.	1.00
09/17/20	K. Kolb	B190	Discuss discovery status items with C. Carty and H. Zimmer	0.30
09/17/20	K. Kolb	B190	Further research and draft summary of third party privilege issue	0.70
09/17/20	K. Kolb	B190	Analyze draft amendment to scheduling order	0.10
09/17/20	K. Kolb	B190	Supervise second level review of subpoena productions	0.40
09/17/20	K. Kolb	B190	Revise memo regarding potential claims	1.00
09/17/20	G. Fromer	B190	Review document review background internal working document	1.00
09/17/20	G. Fromer	B190	Conduct second level review of Deloitte documents regarding pre-Seritage Spinoff Transactions	3.70
09/17/20	G. Fromer	B190	Discuss document review with Heather Zimmer	0.10
09/17/20	G. Fromer	B190	Discuss document review with Heather Zimmer	0.20
09/17/20	E. Plowman	B190	Review and analyze documents in adversary proceeding	4.60
09/17/20	H. Zimmer	B190	Confer with KK and CC regarding discovery open items	0.30
09/17/20	H. Zimmer	B190	Email Andrew Cheung at Wachtell concerning hit reports	0.10
09/17/20	H. Zimmer	B190	Confer with KK, CC, and Dean Chapman concerning deponent list and scheduling order	0.10
09/17/20	H. Zimmer	B190	Review email from KK concerning Deloitte subpoena	0.30
09/17/20	H. Zimmer	B190	Confer with Deloitte concerning privilege log in connection with subpoena	0.10
09/17/20	H. Zimmer	B190	Confer with KK and H5 concerning document review	0.20
09/17/20	H. Zimmer	B190	Review email from KK concerning document review of documents produced in adversary proceeding	0.20
09/18/20	K. Kolb	B190	Revise research memo regarding potential claims	3.10
09/18/20	G. Fromer	B190	Conduct second level review of Deloitte documents regarding pre-Seritage Spinoff Transactions	0.40
09/18/20	G. Fromer	B190	Update analysis as to which state's statute of limitation applies to each potential claim	0.70
09/18/20	G. Fromer	B190	Discuss revising potential claims memorandum with Kyle Kolb	0.10
09/18/20	G. Fromer	B190	Discuss revising potential claims memorandum with Kyle Kolb	0.20
09/18/20	G. Fromer	B190	Research whether place of incorporation or principal place of business is the place where the cause of action accrued under NY borrowing statute	0.40
09/18/20	E. Plowman	B190	Review and analyze docs in adversary proceeding	2.60
09/18/20	R. Quigley	B190	Review documents in productions	1.30
09/18/20	S. Stockman	B190	Confer with IT regarding access to document production	0.30



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			database	
09/18/20	S. Stockman	B190	Review memorandum regarding second level document review and begin review of documents.	2.00
09/18/20	H. Zimmer	B190	Review email from WLRK concerning hit reports of search terms	0.20
09/18/20	H. Zimmer	B190	Confer with Elizabeth Plowman, Linda Schepp, and Kyle Kolb concerning Deloitte production	0.20
09/18/20	H. Zimmer	B190	Review emails from H5 and Linda Schepp concerning document review	0.10
09/18/20	H. Zimmer	B190	Confer with Kyle kolb and Linda Schepp concerning Deloitte subpoena	0.20
09/18/20	H. Zimmer	B190	Draft letter to UBS regarding request for costs and conduct additional research regarding law on division of costs, send same to Chris Carty	2.40
09/18/20	L. Schepp	B190	Review Deloitte document production of various document types for completeness	2.80
09/19/20	K. Kolb	B190	Revise and research for memorandum on potential claims	5.60
09/19/20	K. Kolb	B190	Analyze hit report from subpoena recipient	0.20
09/20/20	K. Kolb	B190	Revise claims analysis memorandum	1.60
09/21/20	C. Carty	B190	Review and analyze documents produced in connection with third party subpoenas.	2.30
09/21/20	K. Kolb	B190	Supervise second level review process	0.40
09/21/20	K. Kolb	B190	Revise memo and review related produced documents regarding potential claims	1.90
09/21/20	C. Anderson	B190	Revise Blackstone document summary and draft related emails	0.10
09/21/20	G. Fromer	B190	Revise potential claims memorandum	1.60
09/21/20	G. Fromer	B190	Conduct legal research on NY court split on applying interests analysis or internal affairs doctrine to choice of law analysis	1.10
09/21/20	G. Fromer	B190	Research whether there is a conflict between New York and Illinois law on aiding and abetting breach of fiduciary duty	0.60
09/21/20	G. Fromer	B190	Research whether interests analysis is applied to claims against third parties	0.50
09/21/20	E. Plowman	B190	Review and analyze documents in adversary proceeding	1.50
09/21/20	H. Zimmer	B190	Review email from Dean Chapman to Judge Drain concerning scheduling order	0.10
09/21/20	H. Zimmer	B190	Review email from contract attorney concerning hot documents	0.10



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
09/21/20	L. Schepp	B190	Compile hot documents for attorney review, per K. Kolb.	0.60
09/22/20	K. Kolb	B190	Revise and revise memorandum summarizing Blackstone subpoena production	0.70
09/22/20	K. Kolb	B190	Further revisions to claims analysis memo	1.70
09/22/20	K. Kolb	B190	Supervise second level review of subpoena response productions	0.20
09/22/20	C. Anderson	B190	Review and analyze Blackstone Document Production for further relevant documents	1.20
09/22/20	C. Anderson	B190	Revise Blackstone document production memo for further detail and draft related emails	0.80
09/22/20	C. Anderson	B190	Draft emails re: Deloitte causes of action research	0.10
09/22/20	D. Field	B190	Review documents produced in adversary proceeding	0.20
09/22/20	E. Plowman	B190	Review and analyze docs in adversary proceeding	2.40
09/22/20	S. Stockman	B190	Continue second level review of documents.	0.80
09/23/20	C. Carty	B190	Review and analyze analysis of potential claims and causes of action.	2.80
09/23/20	C. Carty	B190	Confer with K. Kolb re status of document review and attention to issues related to same.	0.80
09/23/20	K. Kolb	B190	Analyze research by and discuss with C. Anderson regarding additional potential claims	0.50
09/23/20	K. Kolb	B190	Discuss discovery status with C. Carty	0.30
09/23/20	C. Anderson	B190	Review existing Deloitte engagement letters	0.20
09/23/20	C. Anderson	B190	Confer with K. Kolb re: Deloitte causes of action memo/research	0.20
09/23/20	D. Field	B190	Review documents produced in adversary proceeding	2.60
09/23/20	E. Plowman	B190	Review and analyze docs in adversary proceeding	1.60
09/24/20	C. Carty	B190	Call with R. Tizravesh re document review.	0.40
09/24/20	C. Carty	B190	Review and analyze documents produced in connection with third party subpoenas.	5.30
09/24/20	K. Kolb	B190	Analyze documents in connection with supervising second level review	0.30
09/24/20	D. Field	B190	Review documents produced in adversary proceeding	5.00
09/24/20	G. Fromer	B190	Conduct second level review of documents related to pre-Seritage transactions	0.70
09/25/20	C. Carty	B190	Review and analyze analysis of potential claims and causes of action.	2.50
09/25/20	C. Carty	B190	Review and analyze documents produced in connection with third party subpoenas.	1.20
09/25/20	D. Field	B190	Review documents produced in adversary proceeding	2.10
09/25/20	G. Fromer	B190	Conduct second level review of documents relating to pre-Seritage Spinoff transactions	2.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
09/25/20	E. Plowman	B190	Review and analyze docs in adversary proceeding	2.10
09/27/20	D. Field	B190	Review documents produced in adversary proceeding	3.00
09/28/20	K. Kolb	B190	Analyze documents identified as hot during Deloitte review	0.10
09/28/20	D. Field	B190	Review documents produced in adversary proceeding	1.80
09/29/20	C. Carty	B190	Confer with K. Kolb and H. Zimmer re third party discovery and attention to issues re same.	1.20
09/29/20	C. Carty	B190	Review and analyze mini-chron for deposition prep purposes.	0.70
09/29/20	K. Kolb	B190	Supervise second level review	0.60
09/29/20	K. Kolb	B190	Discuss pending discovery items and review process with C. Carty and H. Zimmer	0.40
09/29/20	K. Kolb	B190	Revise summary memo and transmit to Akin regarding third party document production	0.30
09/29/20	D. Field	B190	Review documents produced in adversary proceeding	1.60
09/29/20	E. Plowman	B190	Review and analyze docs in adversary proceeding	6.30
09/29/20	R. Quigley	B190	Review documents in production	8.70
09/29/20	H. Zimmer	B190	Confer with KK and CC concerning third party discovery and review of documents produced in adversary proceeding	0.40
09/29/20	H. Zimmer	B190	Confer with KK and CC concerning discovery and case status	0.10
09/29/20	H. Zimmer	B190	Confer with Deloitte concerning subpoena and privilege log	0.10
09/29/20	H. Zimmer	B190	Review summary from Elizabeth Plowman concerning review of documents produced in adversary proceeding	0.30
09/29/20	H. Zimmer	B190	Confer with Herrick concerning wachtell subpoena	0.10
09/29/20	H. Zimmer	B190	Confer with CC concerning Aronstam production	0.10
09/30/20	S. O'Donnell	B190	Confer w/ cc re misc. issues and tolling agreement	0.30
09/30/20	K. Kolb	B190	Supervise second level review	0.30
09/30/20	K. Kolb	B190	Analyze and summarize hot documents produced by Wachtell	3.30
09/30/20	K. Kolb	B190	Additional research and analysis of potential claims	2.10
09/30/20	C. Anderson	B190	Draft Deloitte Potential Causes of Action Memorandum	1.50
09/30/20	D. Field	B190	Review documents produced in adversary proceeding	2.20
09/30/20	E. Plowman	B190	Review/analyze docs in adversary proceeding	5.10
09/30/20	R. Quigley	B190	Review documents in productions	10.50
09/30/20	S. Stockman	B190	Continue second level review of documents.	3.80
09/30/20	H. Zimmer	B190	Review hot documents on relativity and draft summary, confer with KK on same, and confer with H5 concerning review	1.00



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
09/30/20	H. Zimmer	B190	Attend expert conference	1.10
09/30/20	H. Zimmer	B190	Confer with Akin concerning documents produced in adversary proceeding and experts	0.10
09/30/20	H. Zimmer	B190	Review email from Deloitte in connection with privilege log	0.20
TOTAL				\$327,393.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Anderson	35.10	415.00	14,566.50
M. Calb	28.40	540.00	15,336.00
C. Carty	112.20	785.00	88,077.00
J. D'Angelo	2.60	845.00	2,197.00
D. Field	18.60	435.00	8,091.00
G. Fromer	15.10	420.00	6,342.00
K. Kolb	87.60	610.00	53,436.00
S. O'Donnell	37.80	1,025.00	38,745.00
E. Plowman	77.40	420.00	32,508.00
R. Quigley	42.00	420.00	17,640.00
L. Schepp	30.50	335.00	10,217.50
S. Stockman	6.90	435.00	3,001.50
H. Zimmer	85.60	435.00	37,236.00
TOTAL	579.80		\$327,393.50

MANAGING ATTORNEY'S OFFICE

Court Admissions/Renewals/Registration	164.00
Research/Retrieval - including calls to courts	123.00
TOTAL	\$287.00

TOTAL LEGAL SERVICES \$327,680.50

DISBURSEMENTS:

AMOUNT



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	<u>AMOUNT</u>
Document Processing	75.00
Duplication	2,485.36
Online Research	399.40
Postage & Shipping	157.66
TOTAL:	<u>\$3,117.42</u>

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
354103	04/20/20	291,925.09	233,580.69	58,344.40
355208	05/28/20	390,062.88	312,050.88	78,012.00
356200	06/30/20	189,860.63	0.00	189,860.63
356648	07/16/20	154,837.24	0.00	154,837.24
358158	08/24/20	114,394.47	0.00	114,394.47
Total Outstanding				\$595,448.74



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

November 12, 2020
Invoice Number: 539161
Matter Number: 19609.0002

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through October 31, 2020	\$220,443.50
Expenses posted through October 31, 2020	1,260.74
TOTAL	<u>\$221,704.24</u>
Unpaid balance from previous invoice(s)	\$926,246.66
Total Due Now	\$1,147,950.90

Kindly return this page with your check payment to:
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS

HERRICK, FEINSTEIN LLP • Two Park Avenue • New York, NY 10016 • Phone: 212.592.1400 • Fax: 212.592.1500



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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/01/20	C. Carty	Review and analyze documents produced by third party subpoena recipients.	2.80
10/01/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	3.10
10/01/20	K. Kolb	Further research regarding potential claims and required allegations	1.70
10/01/20	K. Kolb	Draft revised review protocol email and supervise second level review process	2.80
10/01/20	K. Kolb	Further analysis and revisions to summary of hot documents produced by third parties	1.20
10/01/20	K. Kolb	Analyze and summarize key documents produced by Wachtell	0.60
10/01/20	K. Kolb	Analyze privilege logs from Deloitte	0.20
10/01/20	K. Kolb	Discuss document review issues with L. Schepp	0.30
10/01/20	C. Anderson	Draft Deloitte potential causes of action memo and review engagement letters	0.90
10/01/20	C. Anderson	Draft memorandum re: potential causes of action.	1.20
10/01/20	D. Field	Review documents produced in adversary proceeding	0.30
10/01/20	E. Plowman	Review and analyze docs in adversary proceeding	1.60
10/01/20	R. Quigley	Review documents in production	5.20
10/01/20	H. Zimmer	Analyze documents produced in adversary proceeding and draft and finalize memorandum/chart incorporating information from same	1.90
10/01/20	H. Zimmer	Review emails from KK and H5 concerning document review	0.20
10/01/20	H. Zimmer	Revise draft email from KK concerning overview of document review	0.20
10/01/20	H. Zimmer	Confer with CC and KK concerning document review	0.10
10/01/20	H. Zimmer	Confer with LS and KK concerning document review	2.10
10/01/20	L. Schepp	Compile requested Hot documents for Akin attorney review.	1.50
10/02/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	1.50
10/02/20	C. Carty	Review and analyze documents produced by third party subpoena recipients.	1.10



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/02/20	K. Kolb	Revise and analyze engagement letters related to memo for potential claims	1.50
10/02/20	K. Kolb	Further discussions with review team regarding changes to review protocol	0.80
10/02/20	K. Kolb	Analyze response from Akin regarding third party discovery	0.20
10/02/20	K. Kolb	Analyze documents previously withheld by third party subpoena recipient	0.70
10/02/20	C. Anderson	Draft Deloitte potential causes of action memo and review engagement letters	1.50
10/02/20	D. Field	Review documents produced in adversary proceeding	4.20
10/02/20	E. Plowman	Review and analyze docs in adversary proceeding	2.30
10/02/20	H. Zimmer	Confer with DF and KK concerning document review	0.20
10/02/20	H. Zimmer	Review email from Akin concerning Blackstone subpoena and confer with KK and LS concerning same	0.30
10/02/20	H. Zimmer	Review documents produced in adversary proceeding	0.30
10/02/20	L. Schepp	Compile Deloitte engagement letters in H5 workspace for attorney review.	4.50
10/02/20	L. Schepp	Compile documents noted in included in Blackstone document production for further review.	1.40
10/04/20	K. Kolb	Draft email to opposing counsel regarding supplemental parameters for production	0.10
10/04/20	D. Field	Review documents produced in adversary proceeding	1.30
10/05/20	C. Carty	Attention to issues related to third party discovery.	0.70
10/05/20	C. Carty	Review and analyze documents produced by third party subpoena recipients.	2.40
10/05/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	4.30
10/05/20	K. Kolb	Analyze statute of limitations issue	0.50
10/05/20	K. Kolb	Draft revised parameters for Blackstone response	0.60
10/05/20	K. Kolb	Supervise second level review process	0.70
10/05/20	C. Anderson	Draft emails re: BX search terms for new production	0.20
10/05/20	C. Anderson	Review engagement letters with SHC for relevant contract terms	1.00
10/05/20	D. Field	Review documents produced in adversary	2.90



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		proceeding	
10/05/20	H. Zimmer	Confer with KK on document review	0.10
10/05/20	H. Zimmer	Confer with LS and KK concerning document review and Wachtell subpoena	0.10
10/05/20	H. Zimmer	Review emails between Akin and Herrick concerning Blackstone subpoena	0.10
10/05/20	H. Zimmer	Confer with KK and CA concerning Blackstone subpoena	0.20
10/05/20	H. Zimmer	Review email from Cravath concerning subpoena on Ross Aronstam and RPT privilege	0.10
10/05/20	H. Zimmer	Review email from KK to Blackstone concerning subpoena	0.10
10/05/20	H. Zimmer	Confer with KK concerning document review	0.20
10/05/20	L. Schepp	Work with K. Kolb regarding document review protocol.	0.80
10/06/20	K. Kolb	Analyze documents for second level review and supervise second level review process	0.70
10/06/20	K. Kolb	Analyze proposed revisions to search terms for third party subpoena	0.10
10/06/20	R. Quigley	Analyze and code documents in productions	4.50
10/06/20	S. Stockman	Continue 2L Review of documents.	1.70
10/06/20	H. Zimmer	Confer with KK on Blackstone subpoena	0.20
10/06/20	H. Zimmer	Email CA, KK, MC, DF, GF, EP, RQ, CC, and LS concerning updates on document review	0.10
10/06/20	H. Zimmer	Review documents produced in adversary proceeding and communications with Akin on same	0.20
10/06/20	H. Zimmer	Review email from EP concerning document review	0.10
10/06/20	H. Zimmer	Confer with LS and KK concerning document review and Wachtell subpoena	0.80
10/06/20	L. Schepp	Run searches in H5 to separate certain documents for secondary review, per K. Kolb.	3.20
10/07/20	C. Carty	Call with Akin and K. Kolb re document review and prepare for same.	0.90
10/07/20	C. Carty	Attention to issues related to third party discovery.	1.50
10/07/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	3.20
10/07/20	K. Kolb	Supervise second level review and update review team on changes to protocol	0.90
10/07/20	K. Kolb	Call with R. Tizravesh regarding document review process	0.30



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/07/20	K. Kolb	Discuss second level review issues with D. Field	0.20
10/07/20	C. Anderson	Draft and revise memorandum on causes of action	3.00
10/07/20	D. Field	Review documents produced in adversary proceeding	4.00
10/07/20	R. Quigley	Analyze and code documents in productions	6.80
10/07/20	H. Zimmer	Confer with KK concerning document review	0.10
10/07/20	H. Zimmer	Confer with KK and CC concerning third-party discovery	0.10
10/07/20	H. Zimmer	Confer with KK and H5 concerning document review	0.30
10/07/20	H. Zimmer	Review email from Wilmer Hale concerning Blackstone subpoena	0.10
10/08/20	C. Carty	Participate in meet and confer call with counsel to Blackstone and prepare for same.	1.00
10/08/20	C. Carty	Draft letter re third party discovery.	0.50
10/08/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	3.60
10/08/20	K. Kolb	Prepare for and attend meet and confer with counsel for Blackstone	1.20
10/08/20	K. Kolb	Review research on choice of law issue	0.10
10/08/20	K. Kolb	Conduct second level review of key documents	1.90
10/08/20	C. Anderson	Analyze choice of law analysis in light of governing law and dispute resolution provisions and draft related emails	0.30
10/08/20	D. Field	Review documents produced in adversary proceeding	4.80
10/08/20	R. Quigley	Analyze and code documents in productions	3.20
10/08/20	H. Zimmer	Revise Girard/Robbins parameters and confer with CC and KK regarding third-party discovery	0.90
10/08/20	H. Zimmer	Review and amend discovery memo	1.40
10/08/20	H. Zimmer	Confernce call with Wilmer Hale and counsel to Blackstone concerning Blackstone subpoena	0.30
10/08/20	H. Zimmer	Review emails from KK and LS concerning document review	0.20
10/08/20	H. Zimmer	Review documents produced in adversary proceeding	0.20
10/08/20	L. Schepp	Update document production index.	1.80
10/08/20	L. Schepp	Run searches to compile document families with high attachments counts for attorney review, per K. Kolb.	2.10
10/09/20	C. Carty	Attention to issues related to third party	0.60



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		discovery.	
10/09/20	C. Carty	Review and analyze documents produced by third party subpoena recipients.	2.50
10/09/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	1.70
10/09/20	K. Kolb	Analyze key documents produced by third parties and supervise second level review	1.90
10/09/20	K. Kolb	Email to opposing counsel regarding revisions to subpoena response parameters	0.20
10/09/20	K. Kolb	Discuss discovery issues with C. Carty and H. Zimmer	0.50
10/09/20	C. Anderson	Draft and revise memorandum on potential causes of action	1.70
10/09/20	C. Anderson	Draft emails re: memo structure	0.30
10/09/20	D. Field	Review documents produced in adversary proceeding	4.80
10/09/20	R. Quigley	Analyze and code documents in productions	2.40
10/09/20	H. Zimmer	Conference call with KK and CC regarding third party discovery and document review	0.50
10/09/20	H. Zimmer	Confer with KK regarding Blackstone subpoena	0.10
10/09/20	H. Zimmer	Confer with LS and KK concerning document review	0.20
10/09/20	L. Schepp	Run searches in H5 to separate certain documents for secondary review, per K. Kolb.	2.60
10/10/20	K. Kolb	Revise memorandum regarding potential auditor causes of action	1.70
10/10/20	C. Anderson	Draft emails re: memorandum on potential causes of action	0.10
10/11/20	K. Kolb	Draft research summary and recommendation regarding privilege dispute	1.00
10/11/20	D. Field	Review documents produced in adversary proceeding	1.20
10/12/20	C. Carty	Analyze issues related to potential claims against certain third parties and review legal analysis re same.	4.20
10/12/20	C. Carty	Calls with co-counsel at Akin regarding potential claims against certain third parties and prepare for same..	1.10
10/12/20	C. Carty	Review and analyze documents produced in adversary proceeding.	2.10
10/12/20	S. O'Donnell	Confer w/ CC re claims analysis; confer w/ Akin re same; confer w/ client	0.50
10/12/20	C. Anderson	Review Wachtell document productions and	1.80



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		related emails on review procedure	
10/12/20	D. Field	Review documents produced in adversary proceeding	1.10
10/12/20	R. Quigley	Analyze and code documents in productions	8.40
10/12/20	H. Zimmer	Confer with KK and CC on Wachtell subpoena	0.10
10/12/20	H. Zimmer	Analyze documents produced in adversary proceeding and confer with KK on same	1.00
10/13/20	C. Carty	Prepare for call with Litigation Designees regarding potential estate claims.	3.50
10/13/20	C. Carty	Meet with litigation team regarding document review.	0.50
10/13/20	C. Carty	Attention to issues related to document review.	1.20
10/13/20	C. Carty	Participate in call with Litigation Designees regarding claim analysis.	1.10
10/13/20	C. Carty	Draft complaint asserting estate claims against certain third parties.	3.20
10/13/20	C. Carty	Review draft tolling agreement and provide comments to same.	0.80
10/13/20	S. O'Donnell	Review/comment on update to steering committee re Wachtel claims; present same; coordinate tolling agreement, complaint and claim preparation	2.50
10/13/20	K. Kolb	Prepare for and attend call regarding case update and document review second level review	1.20
10/13/20	K. Kolb	Draft tolling agreement	1.00
10/13/20	K. Kolb	Analyze documents in connection with drafting of adversary claims	5.30
10/13/20	C. Anderson	Review and analyze Wachtell document production for relevant documents	0.40
10/13/20	C. Anderson	Confer with case team re: document review points, analysis and timing	0.30
10/13/20	D. Field	Review documents produced in adversary proceeding	1.10
10/13/20	G. Fromer	Team call to discuss document review strategy	0.30
10/13/20	E. Plowman	Team call re review of documents for adversary proceeding	0.30
10/13/20	S. Stockman	Confer with second level review team regarding strategy for ongoing review.	0.30
10/13/20	H. Zimmer	Analyze documents produced in adversary proceeding, confer with KK and CC on same, revise memorandum on document review process, and draft portion of complaint on WLRK claims	5.10



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/13/20	H. Zimmer	Review documents produced in adversary proceeding	0.70
10/13/20	H. Zimmer	Conference call with CC, KK, EP, DF, RQ, SS, GF, and CA on documents produced in adversary proceeding	0.30
10/13/20	L. Schepp	Located and compile various hot document citations in second level batches in preparation for attorney review.	3.80
10/14/20	C. Carty	Revise draft tolling agreement and circulate to potential defendant.	1.20
10/14/20	C. Carty	Draft complaint asserting estate claims against certain third parties.	5.80
10/14/20	S. O'Donnell	Attend to potential additional claims and complaint.	1.00
10/14/20	K. Kolb	Analyze documents and draft complaint	4.00
10/14/20	C. Anderson	Review Wachtell document production for relevant documents and issues	1.90
10/14/20	G. Fromer	Review email instructions on document review procedure from Kyle Kolb	0.30
10/14/20	G. Fromer	Review mini chron topic memo to prepare for second level document review	0.20
10/14/20	G. Fromer	Review hot doc summaries	0.10
10/14/20	G. Fromer	Review document review instructions and analysis to prepare for second level review	0.50
10/14/20	G. Fromer	Conduct second level document review	2.80
10/14/20	R. Quigley	Analyze and code documents in productions	4.30
10/14/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.80
10/14/20	H. Zimmer	Analyze memorandum on potential claims, review case law on same, and draft proposed complaint	3.10
10/14/20	H. Zimmer	Confer with CC on draft complaint	0.20
10/14/20	L. Schepp	Update index of Wachtell invoices in preparation for attorney review, per K. Kolb.	0.30
10/15/20	C. Carty	Draft complaint asserting estate claims against certain third parties.	7.20
10/15/20	C. Carty	Negotiate tolling agreement.	1.30
10/15/20	S. O'Donnell	Coordinate tolling k; review/comment on Wachtell draft; confer re complaint; go forward strategy and analysis w/ team	2.00
10/15/20	K. Kolb	Analyze documents produced by Deloitte	0.70
10/15/20	K. Kolb	Analyze proposed revisions to search term parameters	0.70
10/15/20	K. Kolb	Draft portions of complaint	0.60



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/15/20	K. Kolb	Analyze revisions to tolling agreement	0.50
10/15/20	K. Kolb	Supervise second level review process	0.20
10/15/20	G. Fromer	Discuss potential claims with Sean O'Donnell, Chris Carty, and Kyle Kolb	0.20
10/15/20	R. Quigley	Analyze and code documents in productions	6.80
10/15/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.40
10/15/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.20
10/15/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.40
10/15/20	H. Zimmer	Analyze draft of tolling agreement	0.30
10/15/20	H. Zimmer	Review emails concerning tolling agreement	0.20
10/15/20	H. Zimmer	Confer with KK, SO, and CC concerning tolling agreement	0.20
10/15/20	H. Zimmer	Email Herrick team on tolling agreement and document review	0.40
10/15/20	H. Zimmer	Analyze documents produced in adversary proceeding and revise review memorandum	1.80
10/16/20	K. Kolb	Analyze key documents produced by third party professionals	1.00
10/16/20	R. Quigley	Analyze and code documents in productions	8.80
10/16/20	H. Zimmer	Analyze documents produced in adversary proceeding	4.00
10/16/20	H. Zimmer	Confer with KK and CC re: third-party discovery	0.10
10/16/20	H. Zimmer	Confer with KK on document review	0.20
10/18/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.10
10/18/20	H. Zimmer	Analyze documents produced in adversary proceeding	4.30
10/19/20	C. Carty	Analyze Wachtell proposal regarding search terms.	0.80
10/19/20	K. Kolb	Discuss revisions to Wachtell parameters and communicate same to opposing counsel	0.40
10/19/20	G. Fromer	Review email from Heather Zimmer regarding second level review	0.10
10/19/20	G. Fromer	Conduct second level review of documents relating to pre-Seritage transactions	1.80
10/19/20	R. Quigley	Analyze and code documents in productions	4.10
10/19/20	H. Zimmer	Confer with KK and CC on documents produced in adversary proceeding	0.20
10/19/20	H. Zimmer	Analyze documents produced in adversary	5.10



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		proceeding	
10/19/20	H. Zimmer	Conference call with KK and CC concerning WLRK subpoena	0.20
10/19/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.80
10/19/20	H. Zimmer	Confer with KK and CC concerning e-mail to WLRK concerning subpoena	0.10
10/20/20	S. O'Donnell	Doc review confer.	0.50
10/20/20	K. Kolb	Conduct second level review of key documents from Wachtell and Deloitte productions	0.60
10/20/20	C. Anderson	Review Wachtell document product for relevant documents and hot or of interest productions	1.40
10/20/20	R. Quigley	Analyze and code documents in productions	7.30
10/20/20	H. Zimmer	Review emails from KK concerning document review	0.20
10/20/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.90
10/20/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.70
10/20/20	H. Zimmer	Review documents produced in adversary proceeding	1.00
10/20/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.00
10/20/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.00
10/21/20	K. Kolb	Analyze key documents produced by third parties in response to subpoenas	0.70
10/21/20	C. Anderson	Review and analyze document production for relevant documents and of interest productions	2.00
10/21/20	E. Plowman	Review and analyze docs in adversary proceeding	1.80
10/21/20	R. Quigley	Analyze and code documents in productions	2.00
10/21/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.30
10/21/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.80
10/22/20	C. Anderson	Review and analyze document productions for relevant documents and issues	2.20
10/22/20	G. Fromer	Discuss document review with Heather Zimmer	0.10
10/22/20	E. Plowman	Review and analyze documents in adversary proceeding	2.30
10/22/20	R. Quigley	Analyze and code documents in productions	8.60
10/22/20	H. Zimmer	Confer with Herrick on documents produced in	0.20



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		adversary proceeding	
10/22/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.00
10/22/20	H. Zimmer	Analyze documents produced in adversary proceeding and confer with KK on same	1.30
10/22/20	H. Zimmer	Anlayze documents produced in adversary proceeding	1.10
10/22/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.30
10/22/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.40
10/23/20	K. Kolb	Supervise second level review of subpoena productions	0.20
10/23/20	C. Anderson	Review document production for relevant documents and issues	2.20
10/23/20	R. Quigley	Analyze and code documents in productions	6.60
10/23/20	S. Stockman	Continue 2L Review of adversary production.	1.30
10/23/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.50
10/23/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.10
10/23/20	H. Zimmer	Review email from Blackstone's counsel concerning subpoena on them	0.10
10/23/20	H. Zimmer	Confer with KK and LS concerning document review	0.10
10/23/20	H. Zimmer	Review documents produced in adversary proceeding	0.40
10/23/20	L. Schepp	Create search of documents with high attachment counts for attorney review, per K. Kolb.	1.40
10/24/20	K. Kolb	Analyze documents produced in response to subpoenas	1.00
10/25/20	H. Zimmer	Analyze documents produced in adversary proceeding	2.10
10/25/20	H. Zimmer	Analyze documents produced in the adversary proceeding and revise review memoranda on same	1.20
10/26/20	K. Kolb	Analyze key documents produced in response to subpoenas to professionals	0.50
10/26/20	C. Anderson	Review document production for relevant documents and issues	0.40
10/26/20	C. Anderson	Review document production for relevant documents and issues	0.30
10/26/20	G. Fromer	Conduct second level review of documents	1.80



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		relating to pre-Seritage transactions	
10/26/20	R. Quigley	Analyze and code documents in productions	4.20
10/26/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.40
10/26/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.50
10/26/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.20
10/26/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.40
10/26/20	H. Zimmer	Email WLRK concerning subpoena	0.10
10/26/20	H. Zimmer	Review documents produced in adversary proceeding and analysis provided by Silvia Stockman on same	0.20
10/26/20	H. Zimmer	Analyze documents produced in adversary proceeding	2.70
10/27/20	C. Carty	Call with Wachtell and Defendant's regarding search related to subpoena.	0.30
10/27/20	C. Carty	Analyze issues related to Wachtell search parameters.	1.30
10/27/20	S. O'Donnell	Confer re Wachtell call.	0.20
10/27/20	K. Kolb	Meet and confer call with Wachtell regarding subpoena compliance	0.40
10/27/20	K. Kolb	Analyze key documents from third party productions	0.60
10/27/20	C. Anderson	Review document production for relevant documents	0.90
10/27/20	G. Fromer	Conduct second level review of documents relating to pre-Seritage transactions	4.40
10/27/20	R. Quigley	Analyze and code documents in productions	5.30
10/27/20	H. Zimmer	Prepare for call re: Wachtell subpoena and attend conference call with Wachtell and Wilmer Hale, Kyle Kolb, and Chris Carty concerning subpoena to Wachtell and production in response to same	0.70
10/27/20	H. Zimmer	Revise memorandum on document review	0.20
10/27/20	H. Zimmer	Review emails to Wachtell and from Wilmer Hale concerning Wachtell subpoena	0.10
10/28/20	K. Kolb	Analyze key documents produced by professionals and attend to second level review supervision	0.20
10/28/20	C. Anderson	Review document production for relevant documents and issues	3.20
10/28/20	R. Quigley	Analyze and code documents in productions	4.20



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/28/20	S. Stockman	Review adversary production.	4.70
10/28/20	H. Zimmer	Confer with KK and LS concerning document review and review documents	0.40
10/28/20	H. Zimmer	Review email from KK concerning litigation status	0.10
10/28/20	H. Zimmer	Review documents produced in adversary proceeding and analysis shared by RQ, SS, and GF concerning hot documents	0.60
10/28/20	L. Schepp	Compile additional hot documents for attorney review, per K. Kolb.	1.20
10/29/20	K. Kolb	Supervise second level review process	0.40
10/29/20	K. Kolb	Analyze key documents produced by third party professionals	2.30
10/29/20	C. Anderson	Review document production for relevant documents and issues	1.40
10/29/20	D. Field	Review documents produced in adversary proceeding	1.10
10/29/20	R. Quigley	Analyze and code documents in productions	6.90
10/29/20	S. Stockman	Review adversary production.	4.00
10/29/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.40
10/29/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.60
10/29/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.40
10/29/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.70
10/29/20	L. Schepp	Compile additional hot documents for attorney review, per K. Kolb.	2.40
10/30/20	C. Carty	Review and analyze documents produced in third party discovery.	2.50
10/30/20	K. Kolb	Supervise second level review process	0.50
10/30/20	K. Kolb	Analyze documents produced by debtor professionals	0.70
10/30/20	D. Field	Review documents produced in adversary proceeding	2.60
10/30/20	G. Fromer	Conduct second level review of documents related to pre-Seritage transactions	1.70
10/30/20	G. Fromer	Review email from Kyle Kolb regarding second level document review	0.10
10/30/20	G. Fromer	Review summaries of documents of interest	0.20
10/30/20	R. Quigley	Analyze and code documents in productions	5.60
10/30/20	H. Zimmer	Analyze documents produced in adversary	2.40



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		proceeding	
10/30/20	H. Zimmer	Analyze documents produced in adversary proceeding and draft chart incorporating information from same	1.50
10/30/20	H. Zimmer	Confer with KK ,CA, LS, DF, GF, EP, RQ, SS concerning review of documents produced in adversary proceeding	0.30
10/30/20	H. Zimmer	Confer with KK and LS on review of documents produced in adversary proceeding	0.20
10/30/20	L. Schepp	Compile additional hot or interesting documents for second level review.	1.20
10/31/20	H. Zimmer	Analyze documents produced in adversary proceeding and draft chart of hot documents	2.50
10/31/20	H. Zimmer	Analyze documents produced in adversary proceeding and draft chart incorporating information from same	1.40
10/31/20	H. Zimmer	Review prior memorandum to Akin concerning hot documents and draft chart on hot documents	0.70
			<hr/> 434.50
			<hr/>
TOTAL			\$220,074.50
			<hr/> <hr/>



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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Anderson	28.60	415.00	11,869.00
C. Carty	69.50	785.00	54,557.50
D. Field	29.40	435.00	12,789.00
G. Fromer	14.60	420.00	6,132.00
K. Kolb	46.30	610.00	28,243.00
S. O'Donnell	6.70	1,025.00	6,867.50
E. Plowman	8.30	420.00	3,486.00
R. Quigley	105.20	420.00	44,184.00
L. Schepp	28.20	335.00	9,447.00
S. Stockman	12.00	435.00	5,220.00
H. Zimmer	85.70	435.00	37,279.50
TOTAL	434.50		\$220,074.50

MANAGING ATTORNEY'S OFFICE

Research/Retrieval - including calls to courts	369.00
TOTAL	\$369.00

TOTAL LEGAL SERVICES	\$220,443.50
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DISBURSEMENTS:

	<u>AMOUNT</u>
Online Research	1,260.74
TOTAL:	<u>\$1,260.74</u>



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PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
354103	04/20/20	291,925.09	233,580.69	58,344.40
355208	05/28/20	390,062.88	312,050.88	78,012.00
356200	06/30/20	189,860.63	0.00	189,860.63
356648	07/16/20	154,837.24	0.00	154,837.24
358158	08/24/20	114,394.47	0.00	114,394.47
538312	10/22/20	330,797.92	0.00	330,797.92
Total Outstanding				\$926,246.66



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

December 14, 2020
Invoice Number: 540525
Matter Number: 19609.0002

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through November 30, 2020	\$169,588.50
Expenses posted through November 30, 2020	467.95
TOTAL	<u>\$170,056.45</u>
Unpaid balance from previous invoice(s)	\$309,698.94
Total Due Now	\$479,755.39

Kindly return this page with your check payment to:
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS

HERRICK, FEINSTEIN LLP • Two Park Avenue • New York, NY 10016 • Phone: 212.592.1400 • Fax: 212.592.1500



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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/01/20	D. Field	B190	Review documents produced in adversary proceeding.	0.70
11/01/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft chart incorporating information from same.	0.70
11/02/20	C. Carty	B190	Review and analyze key documents.	1.50
11/02/20	K. Kolb	B190	Analyze key documents produced by professionals in response to subpoenas.	3.00
11/02/20	K. Kolb	B190	Revise summaries of key documents produced in response to subpoenas.	2.80
11/02/20	G. Fromer	B190	Conduct second level review of documents relating to pre-Seritage issues.	1.20
11/02/20	R. Quigley	B190	Analyze and code documents in productions.	7.50
11/02/20	H. Zimmer	B190	Confer with Linda Schepp and Kyle Kolb in connection with review of documents produced in adversary proceeding.	0.10
11/02/20	H. Zimmer	B190	Review email from Kyle Kolb concerning the review of documents produced in adversary proceeding.	0.10
11/02/20	L. Schepp	B190	Compile relevant hot documents for second level attorney review, per K. Kolb.	1.30
11/03/20	K. Kolb	B190	Revise summaries of key documents produced by debtors' professionals.	2.10
11/03/20	K. Kolb	B190	Analyze documents produced by professionals and supervise second level review process.	1.20
11/03/20	R. Quigley	B190	Analyze and code documents in productions.	5.40
11/03/20	S. Stockman	B190	Continue 2L Review.	3.80
11/03/20	H. Zimmer	B190	Email counsel for UBS concerning production in response to subpoena.	0.10
11/03/20	H. Zimmer	B190	Confer with Linda Schepp concerning UBS production.	0.10
11/03/20	H. Zimmer	B190	Confer with Chris Carty concerning UBS production in response to subpoena.	0.10
11/03/20	H. Zimmer	B190	Confer with counsel for UBS concerning UBS production in response to subpoena.	0.10
11/03/20	H. Zimmer	B190	Confer with Kyle Kolb concerning chart incorporation information from review of documents produced in adversary proceeding and review revisions on same.	0.40
11/03/20	H. Zimmer	B190	Email Chris Carty concerning call with UBS counsel in connection with subpoena production.	0.20
11/03/20	H. Zimmer	B190	Review letter from UBS in connection with subpoena response and voicemail from counsel from UBS in	0.30



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			connection with same.	
11/03/20	H. Zimmer	B190	Confer with Linda Schepp and H5 concerning UBS production.	0.10
11/03/20	L. Schepp	B190	Work with attorneys regarding new production from UBS.	0.80
11/04/20	K. Kolb	B190	Analyze documents produced by professionals in response to subpoenas.	0.50
11/04/20	K. Kolb	B190	Discuss and revise summaries of key documents produced by professionals.	0.20
11/04/20	D. Field	B190	Review documents produced in adversary proceeding.	0.30
11/04/20	R. Quigley	B190	Analyze and code documents in productions.	3.20
11/04/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.50
11/04/20	H. Zimmer	B190	Confer with Linda Schepp and H5 concerning UBS production.	0.20
11/04/20	H. Zimmer	B190	Analyze email from UBS concerning their production in response to subpoena.	0.10
11/04/20	L. Schepp	B190	Work with vendor regarding upload of UBS document production.	2.10
11/05/20	C. Carty	B190	Review and analyze key documents.	1.80
11/05/20	K. Kolb	B190	Supervise second level review and analyze documents produced by debtors professionals.	1.40
11/05/20	D. Field	B190	Review documents produced in adversary proceeding.	0.90
11/05/20	G. Fromer	B190	Conduct second level review of documents relating to pre-Seritage transactions.	2.30
11/05/20	R. Quigley	B190	Analyze and code documents and productions.	1.90
11/05/20	N. Veliky	B190	Analyze documents produced in adversary proceeding.	0.70
11/05/20	H. Zimmer	B190	Confer with Nicholas Veliky concerning review of documents produced in adversary proceeding.	0.20
11/05/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft chart summarizing information from same.	1.10
11/05/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft chart summarizing information from same.	3.10
11/06/20	K. Kolb	B190	Analyze key documents produced in response to subpoenas.	1.60
11/06/20	D. Field	B190	Review documents produced in adversary proceeding.	1.60
11/06/20	R. Quigley	B190	Analyze and code documents in productions.	5.50
11/06/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	3.10
11/06/20	H. Zimmer	B190	Confer with H5 concerning UBS production.	0.10
11/08/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.10
11/09/20	K. Kolb	B190	Supervise second level review and analyze key documents produced in response to subpoenas.	0.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/09/20	D. Field	B190	Review documents produced in adversary proceeding.	3.10
11/09/20	G. Fromer	B190	Conduct second level review of documents related to pre-Seritage transactions.	2.70
11/09/20	R. Quigley	B190	Analyze and code documents in productions.	7.20
11/09/20	H. Zimmer	B190	Analyze documents produced in the adversary proceeding.	1.00
11/09/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.50
11/09/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and review comments by Gabrielle Fromer in connection with same.	0.20
11/09/20	H. Zimmer	B190	Review communication from GF concerning document produced in adversary proceeding and review document produced in adversary proceeding.	0.20
11/10/20	C. Carty	B190	Review and analyze key documents and analyze potential claims.	1.70
11/10/20	K. Kolb	B190	Analyze key documents and supervise second level review.	0.70
11/10/20	K. Kolb	B190	Analyze documents produced by debtors' professionals in response to subpoena.	0.60
11/10/20	C. Anderson	B190	Review document production for relevant documents and issues.	3.60
11/10/20	D. Field	B190	Review documents produced in adversary proceeding.	1.60
11/10/20	R. Quigley	B190	Analyze and code documents in productions.	5.20
11/10/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	3.40
11/10/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
11/10/20	H. Zimmer	B190	Confer with Chris Carty concerning review of documents produced in adversary proceeding and case status.	0.10
11/11/20	K. Kolb	B190	Analyze key documents produced in response to subpoenas.	1.20
11/11/20	C. Anderson	B190	Review document production for relevant documents and issues.	2.70
11/11/20	D. Field	B190	Review documents produced in adversary proceeding.	2.60
11/11/20	G. Fromer	B190	Review email from Heather Zimmer regarding focus of document review.	0.10
11/11/20	G. Fromer	B190	Conduct second level review of documents related to pre-Seritage transactions.	0.90
11/11/20	R. Quigley	B190	Analyze and code documents in productions.	2.10
11/11/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	3.00
11/11/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.70
11/11/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft chart incorporating information from same.	0.50



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/11/20	H. Zimmer	B190	Confer with Kyle Kolb on review of documents produced in adversary proceeding and e-mail Herrick Team regarding progress of review of documents.	0.20
11/11/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.20
11/11/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.20
11/12/20	D. Field	B190	Review documents produced in adversary proceeding.	2.40
11/12/20	G. Fromer	B190	Conduct second level review of documents related to pre-Seritage transactions.	0.20
11/12/20	R. Quigley	B190	Analyze and code documents in productions.	3.00
11/12/20	S. Stockman	B190	Continue 2L review of documents.	5.30
11/12/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.90
11/12/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and incorporate information from same into chart.	1.50
11/12/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and incorporate information from same into chart.	3.10
11/12/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.30
11/12/20	H. Zimmer	B190	Confer with Kyle Kolb concerning Blackstone subpoena.	0.10
11/12/20	L. Schepp	B190	Revise second level searches for attorney review.	0.30
11/13/20	D. Field	B190	Review documents produced in adversary proceeding.	1.60
11/13/20	G. Fromer	B190	Conduct second level review of documents related to pre-Seritage transactions.	1.40
11/13/20	R. Quigley	B190	Analyze and code documents in productions.	4.40
11/13/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.00
11/13/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.00
11/13/20	H. Zimmer	B190	Email counsel for Blackstone with regard to their production in response to the subpoena served on them.	0.10
11/13/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and incorporate information into chart.	2.70
11/13/20	H. Zimmer	B190	Email Kyle Kolb and Chris Carty concerning Blackstone subpoena.	0.10
11/13/20	H. Zimmer	B190	Analyze email from counsel for Blackstone concerning subpoena.	0.10
11/14/20	H. Zimmer	B190	Email counsel for Blackstone concerning subpoena.	0.10
11/14/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.10
11/15/20	C. Carty	B190	Analyze issues related to motion for stay.	1.50
11/15/20	C. Carty	B190	Review draft stipulation regarding partial stay.	0.50
11/15/20	D. Field	B190	Review documents produced in adversary proceeding.	3.10
11/15/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.30
11/16/20	C. Carty	B190	Call with D. Chapman regarding status of litigation.	0.40



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/16/20	K. Kolb	B190	Supervise second level review and analyze documents produced by professionals.	1.40
11/16/20	K. Kolb	B190	Analyze issues related to stay motion.	0.20
11/16/20	C. Anderson	B190	Review document production for relevant documents and issues.	0.90
11/16/20	D. Field	B190	Review documents produced in adversary proceeding.	2.40
11/16/20	G. Fromer	B190	Conduct second level review of documents related to pre-Seritage transactions.	4.00
11/16/20	G. Fromer	B190	Email Kyle Kolb regarding document review.	0.10
11/16/20	G. Fromer	B190	Review internal memo on background of related party financings to prepare to review documents related to related party financings.	0.50
11/16/20	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	1.50
11/16/20	E. Plowman	B190	Review and analyze documents in adversary proceeding.	2.10
11/16/20	R. Quigley	B190	Review and code documents in productions.	6.10
11/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.50
11/16/20	H. Zimmer	B190	Confer with Kyle Kolb, Gabrielle Fromer, and Daniel Field concerning review of documents produced in adversary proceeding.	0.10
11/16/20	H. Zimmer	B190	Analyze email and attachments from Akin Gump to Judge Drain and counsel concerning litigation status and stipulation.	0.20
11/16/20	H. Zimmer	B190	Analyze email and attachments from Chris Carty concerning case status.	0.40
11/16/20	H. Zimmer	B190	Confer with counsel for Blackstone and Wilmer Hale concerning subpoena to Blackstone.	0.10
11/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.40
11/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
11/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
11/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.30
11/17/20	C. Carty	B190	Meet and confer call with Blackstone re third party subpoena and prepare for same.	0.70
11/17/20	C. Carty	B190	Call with Sears team re update re temporary stay and status of document review.	0.50
11/17/20	S. O'Donnell	B185	Team call.	0.30
11/17/20	K. Kolb	B190	Supervise second level review.	0.40
11/17/20	K. Kolb	B190	Prepare for and attend meet and confer with Blackstone's counsel	0.50
11/17/20	K. Kolb	B190	Discuss stay and discovery status.	0.30
11/17/20	D. Field	B190	Review documents produced in adversary proceeding.	3.60



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/17/20	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	2.20
11/17/20	G. Fromer	B190	Review email from Kyle Kolb regarding document review.	0.10
11/17/20	E. Plowman	B190	Review and analyze docs in adversary proceeding.	2.20
11/17/20	R. Quigley	B190	Analyze and code documents in productions.	1.60
11/17/20	H. Zimmer	B190	Analyze email from Kyle Kolb regarding status of review of documents produced in adversary proceeding and confer with KK on same	0.10
11/17/20	H. Zimmer	B190	Confer with Chris Carty and Kyle Kolb on Blackstone subpoena and status.	0.10
11/17/20	H. Zimmer	B190	Confer with Chris Carty and Kyle Kolb concerning status of litigation and discovery.	0.20
11/17/20	H. Zimmer	B190	Draft and revise notes from call with Ropes & Gray and WilmerHale on Blackstone subpoena.	0.20
11/17/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.20
11/17/20	H. Zimmer	B190	Conference call with Ropes & Gray and WilmerHale on Blackstone subpoena.	0.30
11/17/20	H. Zimmer	B190	Prepare for and attend conference call with Chris Carty, Sean O'Donnell, and Kyle Kolb concerning case status.	0.40
11/17/20	H. Zimmer	B190	Email WLRK in connection with status of production in response to subpoena.	0.10
11/17/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
11/17/20	H. Zimmer	B190	Confer with Chris Carty and Kyle Kolb on status of negotiations with WLRK and Blackstone for productions to subpoena served on them.	0.20
11/18/20	K. Kolb	B190	Analyze key documents produced by debtor's professionals	0.30
11/18/20	D. Field	B190	Review documents produced in adversary proceeding.	1.90
11/18/20	E. Plowman	B190	Review and analyze documents in adversary proceeding.	2.10
11/18/20	R. Quigley	B190	Analyze and code documents in productions.	7.20
11/18/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	4.00
11/18/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	3.00
11/18/20	H. Zimmer	B190	Analyze email from Wachtell concerning production in response to subpoena.	0.10
11/19/20	K. Kolb	B190	Supervise second level review.	0.30
11/19/20	D. Field	B190	Review documents produced in adversary proceeding.	3.00
11/19/20	G. Fromer	B190	Conduct second level review of documents relating to related party financing transactions.	1.40
11/19/20	R. Quigley	B190	Analyze and code documents in productions.	6.40
11/19/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	3.70



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/19/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.70
11/19/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.60
11/20/20	K. Kolb	B190	Supervise second level review and analyze key documents produced in response to subpoenas	0.80
11/20/20	D. Field	B190	Review documents produced in adversary proceeding.	1.10
11/20/20	G. Fromer	B190	Conduct second level review of documents relating to related party financing transactions.	1.90
11/20/20	R. Quigley	B190	Analyze and code documents in productions.	4.60
11/20/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.10
11/20/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and update review memoranda	2.10
11/21/20	R. Quigley	B190	Analyze and code documents in productions.	3.50
11/21/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.60
11/22/20	D. Field	B190	Review documents produced in adversary proceeding.	2.90
11/22/20	R. Quigley	B190	Analyze and code documents in productions.	2.40
11/22/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.20
11/22/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.80
11/23/20	K. Kolb	B190	Analyze key documents produced by debtors' professionals.	4.00
11/23/20	K. Kolb	B190	Email to opposing counsel regarding subpoena compliance.	0.10
11/23/20	D. Field	B190	Review documents produced in adversary proceeding.	2.60
11/23/20	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	1.70
11/23/20	R. Quigley	B190	Analyze and code documents in productions.	9.60
11/24/20	K. Kolb	B190	Analyze key documents produced in response to subpoenas.	2.20
11/24/20	D. Field	B190	Review documents produced in adversary proceeding.	3.40
11/24/20	R. Quigley	B190	Analyze and code documents in productions.	3.90
11/24/20	S. Stockman	B190	Continue 2LR review.	0.90
11/24/20	H. Zimmer	B190	Analyze email from Kyle Kolb to Blackstone with regard to subpoena production.	0.10
11/25/20	C. Carty	B190	Analyze potential claims and causes of action; review and analyze key documents.	4.20
11/25/20	R. Quigley	B190	Analyze and code documents in productions.	9.80
11/25/20	S. Stockman	B190	Continue 2L review.	2.60
11/25/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.80
11/25/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.30
11/25/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
11/26/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/26/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
11/27/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	3.00
11/27/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.90
11/27/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.50
11/28/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
11/28/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.10
11/28/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.20
11/29/20	D. Field	B190	Review documents produced in adversary proceeding.	3.10
11/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	4.00
11/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.40
11/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	3.70
11/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.40
11/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.00
11/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
11/30/20	C. Carty	B190	Analyze potential claims and causes of action; review and analyze key documents.	1.40
11/30/20	K. Kolb	B190	Supervise second level review and analyze key documents.	0.30
11/30/20	C. Anderson	B190	Review and analyze document production for relevant issues and documents.	0.60
11/30/20	D. Field	B190	Review documents produced in adversary proceeding.	3.40
11/30/20	G. Fromer	B190	Discuss document review with Elizabeth Plowman.	0.20
11/30/20	E. Plowman	B190	Review and analyze documents in adversary proceeding.	4.40
11/30/20	R. Quigley	B190	Analyze and code documents in productions.	8.90
11/30/20	H. Zimmer	B190	Confer with Elizabeth Plowman and Kyle Kolb concerning review of documents produced in adversary proceeding.	0.20
11/30/20	H. Zimmer	B190	Confer with Chris Carty on fee application.	0.10
11/30/20	H. Zimmer	B190	Review email from counsel for Blackstone concerning production in response to subpoena and confer with Kyle Kolb on same.	0.10
11/30/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.60
11/30/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	15.90
TOTAL				\$169,588.50



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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Anderson	7.80	415.00	3,237.00
C. Carty	14.20	785.00	11,147.00
D. Field	45.30	435.00	19,705.50
G. Fromer	22.40	420.00	9,408.00
K. Kolb	26.30	610.00	16,043.00
S. O'Donnell	0.30	1,025.00	307.50
E. Plowman	10.80	420.00	4,536.00
R. Quigley	109.40	420.00	45,948.00
L. Schepp	4.50	335.00	1,507.50
S. Stockman	12.60	435.00	5,481.00
N. Veliky	0.70	470.00	329.00
H. Zimmer	119.40	435.00	51,939.00
TOTAL	373.70		\$169,588.50

DISBURSEMENTS:

	<u>AMOUNT</u>
Messenger	65.50
Online Research	361.55
Pacer Charges	40.90
TOTAL:	<u>\$467.95</u>

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
358158	08/24/20	114,394.47	91,935.87	22,458.60
538312	10/22/20	330,797.92	265,261.82	65,536.10
539161	11/12/20	221,704.24	0.00	221,704.24
Total Outstanding				\$309,698.94



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

January 19, 2021
Invoice Number: 541328
Matter Number: 19609.0002

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through December 31, 2020	\$106,056.50
TOTAL	<u>\$106,056.50</u>
Unpaid balance from previous invoice(s)	\$166,001.10
Total Due Now	\$272,057.60

Kindly return this page with your check payment to:
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

PLEASE REMIT PAYMENT WITHIN 30 DAYS

HERRICK, FEINSTEIN LLP • Two Park Avenue • New York, NY 10016 • Phone: 212.592.1400 • Fax: 212.592.1500



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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/19/20	D. Field	B190	Review documents produced in adversary proceeding.	2.00
12/01/20	K. Kolb	B190	Analyze key documents produced in response to subpoenas.	0.90
12/01/20	K. Kolb	B190	Analyze key documents produced in response to subpoenas.	1.20
12/01/20	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	1.70
12/01/20	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	1.60
12/01/20	R. Quigley	B190	Analyze and code documents in productions.	7.70
12/01/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.20
12/02/20	K. Kolb	B190	Begin drafting cross-exam outline.	0.40
12/02/20	C. Anderson	B190	Review and analyze document production for relevant issues and documents.	1.20
12/02/20	D. Field	B190	Review documents produced in adversary proceeding.	1.20
12/02/20	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	2.60
12/02/20	R. Quigley	B190	Analyze and code documents in productions.	6.10
12/02/20	S. Stockman	B190	Continue 2L review.	5.60
12/02/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.00
12/02/20	H. Zimmer	B190	Confer with Chris Carty and Kyle Kolb on Wachtell subpoena.	0.10
12/02/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.70
12/03/20	K. Kolb	B190	Analyze response from opposing counsel regarding subpoena collection.	0.20
12/03/20	K. Kolb	B190	Supervise second level review.	0.20
12/03/20	K. Kolb	B190	Revise summaries of key documents produced in response to subpoenas.	2.90
12/03/20	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	0.80
12/03/20	R. Quigley	B190	Analyze and code documents in productions.	5.60
12/03/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.40
12/03/20	H. Zimmer	B190	Confer with Kyle Kolb concerning Blackstone subpoena.	0.10
12/03/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.90
12/03/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.80
12/03/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and update chart summarizing hot documents marked	0.80



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			from same.	
12/04/20	C. Carty	B190	Review and analyze draft NDA (0.4); call with D. Chapman re same (0.1).	0.50
12/04/20	K. Kolb	B190	Revise summaries of key documents produced in response to subpoenas.	3.20
12/04/20	C. Anderson	B190	Review document production for relevant issues and documents.	0.70
12/04/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.70
12/04/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.50
12/04/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.30
12/04/20	H. Zimmer	B190	Analyze fee statements from July through October and draft portion of fee application related to same.	0.90
12/04/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and update chart summarizing hot documents marked from same.	0.40
12/06/20	K. Kolb	B190	Revise summaries of key documents produced in response to subpoenas.	1.70
12/06/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.20
12/06/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.20
12/06/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/06/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.60
12/07/20	K. Kolb	B190	Supervise second level review of documents produced in response to subpoena.	0.20
12/07/20	D. Field	B190	Review documents produced in adversary proceeding.	0.30
12/07/20	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	6.50
12/07/20	R. Quigley	B190	Analyze and code documents in productions.	2.40
12/07/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/07/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.30
12/07/20	H. Zimmer	B190	Email WLRK concerning subpoena and document production in response to subpoena.	0.10
12/07/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and update chart summarizing hot documents marked from same.	0.40
12/08/20	K. Kolb	B190	Supervise second level review of subpoena productions.	0.20
12/08/20	K. Kolb	B190	Emails with opposing counsel regarding subpoena.	0.10
12/08/20	D. Field	B190	Review documents produced in adversary proceeding.	1.30
12/08/20	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	3.00
12/08/20	S. Stockman	B190	Continue 2L review.	1.30
12/08/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
12/08/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.70
12/08/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.10
12/08/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and confer with Kyle Kolb concerning third-party production in response to subpoenas.	1.10
12/09/20	K. Kolb	B190	Revise summaries of key documents.	1.80
12/09/20	K. Kolb	B190	Supervise second level review process.	0.30
12/09/20	R. Quigley	B190	Analyze and code documents in productions.	3.10
12/09/20	S. Stockman	B190	Continue 2L review.	2.20
12/09/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.20
12/09/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.60
12/09/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and review edits from KK to chart summarizing hot documents.	2.40
12/09/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/09/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.30
12/09/20	H. Zimmer	B190	Confer with counsel concerning subpoena served on Blackstone.	0.10
12/09/20	H. Zimmer	B190	Email WLRK concerning subpoena and document production in response to subpoena.	0.10
12/10/20	K. Kolb	B190	Supervise second level review of documents produced by debtors' professionals.	0.10
12/10/20	K. Kolb	B190	Prepare for and attend meet and confer with counsel to Blackstone.	0.50
12/10/20	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	1.00
12/10/20	R. Quigley	B190	Analyze and code documents in productions.	1.30
12/10/20	S. Stockman	B190	Continue 2L review.	2.20
12/10/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.20
12/10/20	H. Zimmer	B190	Confer with Kyle Kolb and Chris Carty on third-party discovery	0.30
12/10/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.30
12/10/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/10/20	H. Zimmer	B190	Prepare for conference with counsel for Blackstone and Wilmer Hale concerning Blackstone subpoena, attend conference call, and confer with Kyle Kolb on same.	0.90
12/10/20	H. Zimmer	B190	Confer with Kyle Kolb on third party discovery and review of documents produced in adversary proceeding.	0.20
12/10/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.20
12/10/20	L. Schepp	B190	Compile documents cited in Barclays proffer.	4.70
12/11/20	C. Carty	B190	Correspondence related to third party subpoenas.	0.30



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
12/11/20	K. Kolb	B190	Initial draft of response to opposing counsel.	0.20
12/11/20	K. Kolb	B190	Draft email to opposing counsel.	0.30
12/11/20	E. Plowman	B190	Review and analyze docs in adversary proceeding.	2.70
12/11/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.80
12/11/20	H. Zimmer	B190	Confer with CC on subpoena to Girard Sharp and Robbins Arroyo, analyze search parameters concerning same, and review email from CC to same concerning subpoena.	0.20
12/11/20	H. Zimmer	B190	REvise email to Blackstone and confer with KK on same	0.30
12/11/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/11/20	H. Zimmer	B190	Revise email to Blackstone and confer with KK on same	0.70
12/14/20	K. Kolb	B190	Supervise second level review.	0.20
12/14/20	R. Quigley	B190	Analyze and code documents in productions.	2.00
12/14/20	S. Stockman	B190	Continue 2L review.	6.20
12/14/20	H. Zimmer	B190	Analyze letter from WLRK concerning production in response to subpoena.	0.10
12/14/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/14/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/14/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/14/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/15/20	K. Kolb	B190	Further meet and confer email to opposing counsel.	0.20
12/15/20	R. Quigley	B190	Analyze and code documents in productions.	6.80
12/15/20	S. Stockman	B190	Continue 2L review.	1.60
12/15/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.60
12/15/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.90
12/15/20	H. Zimmer	B190	ANalyze documents produced in adversary proceeding.	3.50
12/15/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/15/20	H. Zimmer	B190	Confer with KK on documents produced in adversary proceeding.	0.10
12/15/20	H. Zimmer	B190	Analyze email from KK to Blackstone concerning subpoena.	0.10
12/16/20	K. Kolb	B190	Supervise second level review and analyze new documents produced by debtors' professionals.	0.30
12/16/20	R. Quigley	B190	Analyze and code documents in productions.	2.60
12/16/20	S. Stockman	B190	Continue 2L review.	1.00
12/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.10
12/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.80
12/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.10
12/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.10



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
12/16/20	H. Zimmer	B190	Confer with counsel for Firard Sharp and Robbins Arroyo concerning subpoena.	0.10
12/16/20	H. Zimmer	B190	Confer with KK, CC, and H5 concerning WLRK production.	0.10
12/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.20
12/16/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and confer on same.	1.20
12/18/20	K. Kolb	B190	Email to opposing counsel regarding subpoena.	0.50
12/18/20	H. Zimmer	B190	Analyze email from Blackstone concerning subpoena and prior discussions with same and confer with KK.	0.30
12/18/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.50
12/18/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.80
12/18/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	6.20
12/20/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and revise chart summarizing hot documents.	0.60
12/20/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and review motions to dismiss concerning related topics.	0.70
12/20/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.50
12/20/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.60
12/21/20	C. Carty	B190	Call with H. Zimmer re meet and confer and prepare for same.	0.50
12/21/20	C. Carty	B190	Meet and confer with subpoena recipient and prepare for same.	0.50
12/21/20	K. Kolb	B190	Supervise second level review.	0.10
12/21/20	E. Plowman	B190	Review and analyze documents in adversary proceeding.	1.20
12/21/20	R. Quigley	B190	Analyze and code documents in productions.	4.80
12/21/20	H. Zimmer	B190	Confer with Chris Carty concerning subpoena on Girard Sharp and Robbins Arroyo and analyze draft search parameters and documents produced in adversary proceeding concerning same.	0.30
12/21/20	H. Zimmer	B190	Prepare for and attend conference call with counsel at Wilmer Hake, Girard Sharp, and Robbins Arroyo in connection with subpoena.	0.40
12/21/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	3.00
12/22/20	K. Kolb	B190	Supervise second level review of subpoena productions.	0.20
12/22/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.50
12/22/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.70
12/22/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	3.50
12/22/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.70
12/23/20	E. Plowman	B190	Review and analyze documents in adversary proceeding.	1.60



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
12/23/20	H. Zimmer	B190	Confer with KK and CC concerning review of documents produced in adversary proceeding.	0.10
12/23/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.80
12/23/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.20
12/23/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.50
12/23/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.50
12/24/20	E. Plowman	B190	Review and analyze documents in adversary proceeding.	2.10
12/24/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.20
12/24/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.60
12/24/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.70
12/24/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/25/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.10
12/25/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.80
12/25/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.10
12/25/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.40
12/25/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.80
12/26/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.30
12/26/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.40
12/26/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/27/20	K. Kolb	B190	Supervise second level review.	0.20
12/28/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.30
12/28/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.60
12/28/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.40
12/28/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.10
12/28/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.70
12/28/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.60
12/28/20	H. Zimmer	B190	Confer with KK and CC concerning subpoena served on WLRK.	0.10
12/29/20	C. Carty	B190	Review and analyze key documents.	1.50
12/29/20	K. Kolb	B190	Revise search for new hot documents.	0.30
12/29/20	K. Kolb	B190	Analyze documents produced by Blackstone.	0.30
12/29/20	K. Kolb	B190	Analyze key documents produced in response to subpoenas.	0.20
12/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.40
12/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.20
12/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.50
12/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and confer with KK and LS concerning same.	0.30



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
12/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and confer with KK and CC concerning documents produced in adversary proceeding.	0.30
12/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.60
12/29/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
12/30/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding and confer with KK concerning same.	2.00
12/30/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.70
12/30/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.70
12/30/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.10
12/30/20	H. Zimmer	B190	Analyze email from WLRK concerning production in response to subpoena.	0.10
12/31/20	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.20
12/31/20	H. Zimmer	B190	Confer with KK and LS concerning documents produced in adversary proceeding.	0.20
12/31/20	L. Schepp	B190	Update document production index and distribute to case team.	0.70

TOTAL \$106,056.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Anderson	1.90	415.00	788.50
C. Carty	3.30	785.00	2,590.50
D. Field	4.80	435.00	2,088.00
G. Fromer	17.20	420.00	7,224.00
K. Kolb	16.90	610.00	10,309.00
E. Plowman	7.60	420.00	3,192.00
R. Quigley	42.40	420.00	17,808.00
L. Schepp	5.40	335.00	1,809.00
S. Stockman	20.10	435.00	8,743.50
H. Zimmer	118.40	435.00	51,504.00
TOTAL	238.00		\$106,056.50



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PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
358158	08/24/20	114,394.47	91,935.87	22,458.60
538312	10/22/20	330,797.92	265,261.82	65,536.10
539161	11/12/20	221,704.24	177,615.54	44,088.70
540525	12/14/20	170,056.45	136,138.75	33,917.70
Total Outstanding				\$166,001.10



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

February 24, 2021
Invoice Number: 542909
Matter Number: 19609.0002

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through January 31, 2021	\$178,521.00
Expenses posted through January 31, 2021	121.76
TOTAL	<u>\$178,642.76</u>
Unpaid balance from previous invoice(s)	\$272,057.60
Total Due Now	\$450,700.36

INVOICE PAYMENT IS DUE UPON RECEIPT. THANK YOU.

Kindly return this page with your check payment to:
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33



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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
12/13/20	D. Field	B190	Review documents produced in adversary proceeding.	3.00
01/03/21	C. Carty	B190	Analyze issues related to review of documents produced by Wachtell.	0.30
01/03/21	H. Zimmer	B190	Confer with KK on review of documents produced in adversary proceeding and tolling agreement.	0.10
01/03/21	H. Zimmer	B190	Confer with CC and KK on review of documents produced in adversary proceeding.	0.10
01/04/21	K. Kolb	B190	Supervise workflow of second level reviews.	0.30
01/04/21	G. Fromer	B190	Discuss document review with Heather Zimmer.	0.10
01/04/21	H. Zimmer	B190	Review email from Audrey North concerning review of documents produced in adversary proceeding.	0.10
01/04/21	H. Zimmer	B190	Confer with KK and CA on documents produced by Blackstone.	0.10
01/04/21	H. Zimmer	B190	Confer with KK, EP, RQ, LS concerning documents produced in adversary proceeding.	0.10
01/05/21	C. Carty	B190	Review and analyze key documents from third party productions in connection with claims analysis.	3.20
01/05/21	G. Fromer	B190	Conduct second level review of documents related to related party financing transactions.	2.10
01/05/21	G. Fromer	B190	Review Wachtell documents for relevance.	3.00
01/05/21	E. Plowman	B190	Draft summaries of documents tagged as "hot" or "of interest."	4.20
01/05/21	R. Quigley	B190	Analyze documents in productions considered to be hot or of interest and draft or revise descriptions of those documents.	4.10
01/05/21	S. Stockman	B190	Confer with discovery support regarding access to review database.	0.20
01/05/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.50
01/05/21	H. Zimmer	B190	Confer with KK concerning review of documents produced in adversary proceeding.	0.10
01/05/21	H. Zimmer	B190	Confer with EP, RQ, LS, and KK concerning review of documents produced in adversary proceeding and drafting summaries of relevant information from same	0.40
01/05/21	H. Zimmer	B190	Confer with LS and H5 concerning documents produced in adversary proceeding.	0.40
01/05/21	L. Schepp	B190	Create Relativity search for batching documents of interest for further review, per H. Zimmer.	0.60
01/05/21	L. Schepp	B190	Compile and update of additional hot and of interest	3.60



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			documents from 1LR review.	
01/06/21	C. Carty	B190	Confer with co-counsel regarding status of adversary proceeding.	0.20
01/06/21	C. Carty	B190	Review and analyze decision from state court insurance action related to adversary proceeding.	0.70
01/06/21	C. Carty	B190	Review and analyze draft consolidation papers related to adversary proceeding.	0.50
01/06/21	K. Kolb	B190	Discuss review issues with second level reviewers.	0.30
01/06/21	G. Fromer	B190	Review memorandum on focus of document review.	0.40
01/06/21	G. Fromer	B190	Review Wachtell documents for relevance.	6.20
01/06/21	E. Plowman	B190	Draft summaries of hot/of interest documents.	2.60
01/06/21	R. Quigley	B190	Analyze documents in productions considered to be hot or of interest and draft or revise descriptions of those documents.	4.40
01/06/21	S. Stockman	B190	Continue second level review.	3.00
01/06/21	H. Zimmer	B190	Confer with KK concerning review of documents produced in adversary proceeding.	0.10
01/06/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.20
01/07/21	C. Carty	B190	Review and analyze key documents from third party productions in connection with claims analysis.	3.80
01/07/21	G. Fromer	B190	Review Wachtell documents for relevance.	6.20
01/07/21	E. Plowman	B190	Draft hot document summaries.	2.30
01/07/21	R. Quigley	B190	Analyze documents in productions considered to be hot or of interest and draft or revise descriptions of those documents.	6.70
01/07/21	S. Stockman	B190	Continue second level review of documents.	0.30
01/08/21	C. Carty	B190	Review and analyze key documents from third party productions in connection with claims analysis.	1.30
01/08/21	K. Kolb	B190	Respond to second level review questions regarding subpoena reviews.	0.30
01/08/21	K. Kolb	B190	Supervise second level review.	0.10
01/08/21	G. Fromer	B190	Review Wachtell documents for relevance.	3.80
01/08/21	E. Plowman	B190	Draft summaries of hot/of interest docs.	2.10
01/08/21	R. Quigley	B190	Analyze documents in productions considered to be hot or of interest and draft or revise descriptions of those documents.	6.10
01/08/21	S. Stockman	B190	Continue second level review of documents.	0.40
01/08/21	H. Zimmer	B190	Analyze Second Circuit decisions on calculations of damages for compensation of trade secret violations.	0.90
01/08/21	H. Zimmer	B190	Confer with KK on review of documents produced in adversary proceeding.	0.10



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
01/11/21	C. Anderson	B190	Review Blackstone Document Production for relevant appraisal documents and correspondences.	0.40
01/11/21	G. Fromer	B190	Review Wachtell documents for relevance.	2.40
01/11/21	E. Plowman	B190	Review and analyze documents in adversary proceeding.	3.30
01/11/21	R. Quigley	B190	Analyze and code documents in productions.	6.20
01/11/21	S. Stockman	B190	Conduct review of Wachtell document production.	2.90
01/11/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.20
01/11/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.20
01/12/21	C. Carty	B190	Review and analyze key documents from third party productions in connection with claims analysis.	2.50
01/12/21	C. Carty	B190	Draft tolling agreement.	0.40
01/12/21	C. Carty	B190	Call with team regarding Wachtell claim analysis.	0.40
01/12/21	K. Kolb	B190	Revise summaries of hot documents produced by debtors' professionals.	3.10
01/12/21	K. Kolb	B190	Discuss review priority and update review team re same.	0.50
01/12/21	C. Anderson	B190	Review and analyze Blackstone and Greenlight document production.	3.00
01/12/21	R. Quigley	B190	Analyze and code documents in productions.	6.40
01/12/21	S. Stockman	B190	Continue review of Wachtell document production.	2.30
01/12/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	2.30
01/12/21	H. Zimmer	B190	Confer with Chris Carty, Kyle Kolb, and Linda Schepp concerning review of documents produced in adversary proceeding.	0.40
01/12/21	H. Zimmer	B190	Analyze and summary of hot documents and confer with LS concerning same.	0.40
01/12/21	H. Zimmer	B190	Confer with KK, LS, and H5 concerning documents produced in adversary proceeding, review of same, and work product incorporation information from same.	0.70
01/12/21	L. Schepp	B190	Compile additional interesting documents for attorney review.	2.60
01/13/21	C. Carty	B190	Finalize tolling agreement extension.	0.50
01/13/21	K. Kolb	B190	Analyze summaries of key documents produced in response to subpoenas.	4.30
01/13/21	K. Kolb	B190	Supervise second level review process.	0.60
01/13/21	C. Anderson	B190	Review and analyze additional Blackstone/Greenlight document production for relevant documents.	1.60
01/13/21	C. Anderson	B190	Review Greenlight and Blackstone document production for relevant documents.	0.20
01/13/21	E. Plowman	B190	Review and analyze documents in adversary proceeding.	2.10



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
01/13/21	R. Quigley	B190	Analyze and code documents in productions.	7.20
01/13/21	S. Stockman	B190	Continue review of Wachtell document production.	3.90
01/13/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	2.90
01/13/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.70
01/13/21	H. Zimmer	B190	Confer with LS and KK concerning hot document summaries.	0.20
01/13/21	L. Schepp	B190	Compile additional interesting documents for attorney review.	2.30
01/14/21	C. Carty	B190	Draft update to Litigation Designees on status of Wachtell claim analysis.	0.50
01/14/21	C. Carty	B190	Review and analyze key documents produced in third party discovery in connection with Wachtell claim analysis.	4.80
01/14/21	K. Kolb	B190	Analyze key documents and accompanying summaries produced by debtors' counsel in response to subpoena.	3.40
01/14/21	C. Anderson	B190	Review and analyze Greenlight/Blackstone document production for relevant documents.	1.60
01/14/21	C. Anderson	B190	Review and analyze Greenlight/Blackstone document production for relevant documents.	0.20
01/14/21	G. Fromer	B190	Review Wachtell documents for relevance.	0.90
01/14/21	E. Plowman	B190	Review and analyze docs in adversary proceeding.	6.00
01/14/21	R. Quigley	B190	Analyze and code documents in productions.	5.20
01/14/21	S. Stockman	B190	Continue second level review of Wachtell documents.	3.30
01/14/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	1.40
01/14/21	H. Zimmer	B190	Confer with CC concerning documents produced in adversary proceeding and WLRK and review from CC concerning same.	0.20
01/14/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.30
01/14/21	H. Zimmer	B190	Review email from KK concerning review of documents produced in adversary proceeding.	0.10
01/15/21	C. Carty	B190	Review and analyze key documents produced in third party discovery in connection with Wachtell claim analysis.	3.10
01/15/21	K. Kolb	B190	Analyze and revise summaries of hot documents.	2.10
01/15/21	C. Anderson	B190	Review Greenlight/Blackstone document production for relevant documents.	0.50
01/15/21	D. Field	B190	Review documents produced in adversary proceeding.	1.00
01/15/21	G. Fromer	B190	Review Wachtell documents for relevance.	1.30



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
01/15/21	E. Plowman	B190	Review and analyze documents in adversary proceeding.	4.20
01/15/21	R. Quigley	B190	Analyze and code documents in productions.	0.00
01/15/21	R. Quigley	B190	Analyze and code documents in productions.	5.40
01/15/21	S. Stockman	B190	Continue review of Wachtell document production.	3.50
01/15/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	3.50
01/15/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.10
01/15/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.80
01/15/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.10
01/15/21	H. Zimmer	B190	Confer with H5 concerning documents produced by WLRK.	0.10
01/15/21	H. Zimmer	B190	Confer with CC and KK concerning documents produced by WLRK.	0.10
01/16/21	C. Carty	B190	Review and analyze key documents produced in third party discovery in connection with Wachtell claim analysis.	2.50
01/16/21	K. Kolb	B190	Revise summaries of key documents produced in response to subpoenas.	1.00
01/16/21	D. Field	B190	Review documents produced in adversary proceeding.	2.90
01/16/21	R. Quigley	B190	Analyze and code documents in productions.	3.00
01/16/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.00
01/16/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	0.50
01/17/21	K. Kolb	B190	Analyze key documents produced in response to subpoenas and revise corresponding summaries.	4.10
01/17/21	D. Field	B190	Review documents produced in adversary proceeding.	5.40
01/17/21	R. Quigley	B190	Analyze and code documents in productions.	3.50
01/17/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	4.50
01/18/21	C. Carty	B190	Draft outline of analysis.	1.20
01/18/21	C. Carty	B190	Review and analyze key documents produced in third party discovery in connection with same.	4.50
01/18/21	C. Carty	B190	Review and analyze research related to Wachtell claim analysis.	2.10
01/18/21	C. Carty	B190	Call with Litigation Designees re same.	0.50
01/18/21	K. Kolb	B190	Analyze key documents produced in response to subpoena and revise accompanying summaries.	6.20
01/18/21	C. Anderson	B190	Review Greenlight/Blackstone document production for relevant documents.	1.00
01/18/21	D. Field	B190	Review documents produced in adversary proceeding.	1.30
01/18/21	G. Fromer	B190	Review Wachtell documents for relevance.	2.80
01/18/21	E. Plowman	B190	Review and analyze documents in adversary proceeding.	1.10
01/18/21	R. Quigley	B190	Analyze and code documents in productions.	3.00



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
01/18/21	S. Stockman	B190	Continue review of Wachtell document production.	4.90
01/18/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	5.10
01/18/21	H. Zimmer	B190	Confer with CC concerning review of documents produced in adversary proceeding and call concerning WLRK.	0.20
01/18/21	H. Zimmer	B190	Prepare for call with Trustees, Attend call with Herrick and Trustees concerning WLRK, and draft summary concerning same.	1.10
01/18/21	H. Zimmer	B190	Confer with KK, CC, LS, and other associates HF concerning review of documents produced in adversary proceeding, and review documents.	0.50
01/19/21	C. Carty	B190	Confer with co-counsel regarding Wachtell claim analysis.	0.40
01/19/21	C. Carty	B190	Draft high level analysis for Litigation Designees regarding Wachtell claims.	0.90
01/19/21	C. Carty	B190	Review and analyze key documents produced in third party discovery in connection with Wachtell claim analysis.	1.80
01/19/21	S. O'Donnell	B190	Claim analysis; confer w/ team re same; confer w/ akin re same.	1.00
01/19/21	K. Kolb	B190	Supervise second level review of final tranche of third party production.	0.10
01/19/21	K. Kolb	B190	Analyze and revise summaries of key documents produced in response to subpoenas.	0.80
01/19/21	C. Anderson	B190	Review Greenlight/Blackstone document production for relevant documents	1.10
01/19/21	H. Zimmer	B190	Confer with KK and LS concerning documents produced by Deloitte.	0.10
01/19/21	H. Zimmer	B190	Revise summary of potential claims against for Trustees.	0.80
01/19/21	L. Schepp	B190	Compile Deloitte interesting documents for attorney review.	1.20
01/20/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	2.00
01/20/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	0.50
01/20/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	1.50
01/20/21	H. Zimmer	B190	Revise summaries on documents produced in adversary proceeding.	2.50
01/21/21	C. Carty	B190	Review and analyze key documents produced in third party discovery in connection with Wachtell claim analysis.	1.10



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
01/21/21	S. O'Donnell	B190	Review/revise memo to litigation designee committee; confer w/ team re same; confer w/ LDC re same.	1.00
01/21/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	0.50
01/21/21	H. Zimmer	B190	Review email from KK concerning status of case.	0.10
01/22/21	C. Carty	B190	Review and analyze key documents produced in third party discovery in connection with Wachtell claim analysis.	1.50
01/23/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	0.70
01/23/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	1.20
01/24/21	K. Kolb	B190	Analyze and revise summaries of key documents produced by Deloitte.	1.90
01/24/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	2.20
01/25/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	0.50
01/26/21	K. Kolb	B190	Analyze and revise summaries of key documents produced by Deloitte.	2.00
01/26/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	1.00
01/26/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	2.70
01/26/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	0.80
01/26/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	1.50
01/26/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	0.80
01/27/21	C. Carty	B190	Review and analyze key documents produced in connection with adversary proceeding.	1.20
01/27/21	H. Zimmer	B190	Analyze documents produced in adversary and draft summaries incorporating relevant information from	0.50



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Invoice Number: 542909
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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			same.	
01/27/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	2.60
01/28/21	K. Kolb	B190	Review and revise summaries of key documents produced by Deloitte.	1.80
01/28/21	C. Anderson	B190	Review Greenlight/Blackstone document production for relevant documents	1.30
01/28/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	0.90
01/28/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	1.20
01/28/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	0.60
01/28/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	0.80
01/28/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	1.00
01/29/21	C. Anderson	B190	Review Greenlight/Blackstone document production for relevant documents	0.80
01/29/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	1.10
01/30/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	0.80
01/30/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	1.80
01/30/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	0.50
01/30/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	1.00
01/30/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries with relevant information from same.	1.80



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
01/30/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating relevant information from same.	0.40
01/31/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporate relevant information from same.	3.60
01/31/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporate relevant information from same.	1.10
01/31/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and scope of subpoena sent to third parties.	1.40
01/31/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding.	1.30
01/31/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and summarize relevant information from same in memorandum.	1.20
01/31/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summaries incorporating information from same.	2.10
01/31/21	H. Zimmer	B190	E-mail CC and KK concerning discovery status.	0.10
01/31/21	H. Zimmer	B190	Analyze documents produced in adversary proceeding and draft summary incorporating information from same.	1.20
			TOTAL	\$178,521.00



HERRICK

Invoice Number: 542909
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Anderson	11.70	435.00	5,089.50
C. Carty	39.90	850.00	33,915.00
D. Field	3.00	435.00	1,305.00
D. Field	10.60	475.00	5,035.00
G. Fromer	29.20	460.00	13,432.00
K. Kolb	32.90	690.00	22,701.00
S. O'Donnell	2.00	1,075.00	2,150.00
E. Plowman	27.90	460.00	12,834.00
R. Quigley	61.20	460.00	28,152.00
L. Schepp	10.30	350.00	3,605.00
S. Stockman	24.70	475.00	11,732.50
H. Zimmer	81.20	475.00	38,570.00
TOTAL	334.60		\$178,521.00

DISBURSEMENTS:

	<u>AMOUNT</u>
Online Research	41.76
Pacer Charges	80.00
TOTAL:	<u>\$121.76</u>

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
358158	08/24/20	114,394.47	91,935.87	22,458.60
538312	10/22/20	330,797.92	265,261.82	65,536.10
539161	11/12/20	221,704.24	177,615.54	44,088.70
540525	12/14/20	170,056.45	136,138.75	33,917.70
541328	01/19/21	106,056.50	0.00	106,056.50
Total Outstanding				\$272,057.60



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

March 25, 2021
Invoice Number: 544218
Matter Number: 19609.0002

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through February 28, 2021	\$25,950.00
TOTAL	<u>\$25,950.00</u>
Unpaid balance from previous invoice(s)	\$450,700.36
Total Due Now	\$476,650.36

INVOICE PAYMENT IS DUE UPON RECEIPT. THANK YOU.

Kindly return this page with your check payment to:
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33



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Invoice Number: 544218
Matter Number: 19609.0002
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
02/01/21	C. Carty	B190	Call with K. Kolb and H. Zimmer regarding status of adversary proceeding discovery and prepare for same.	0.50
02/01/21	K. Kolb	B190	Discuss status of all third party discovery with C. Carty and H. Zimmer.	0.30
02/01/21	C. Anderson	B110	Review Greenlight/Blackstone document production for relevant documents	1.10
02/02/21	H. Zimmer	B190	Confer with Girard Sharp and Robbins Arroyo on subpoena.	0.10
02/04/21	C. Anderson	B110	Review Greenlight/Blackstone document production for relevant documents	1.20
02/05/21	C. Carty	B190	Analyze correspondence related to third party discovery.	0.80
02/05/21	C. Carty	B190	Review and analyze hot docs binders related to adversary proceeding.	2.90
02/05/21	K. Kolb	B190	Analyze and revise summaries of key documents produced by Deloitte.	3.30
02/05/21	H. Zimmer	B190	Confer with CC and KK on subpoena to Girard Sharp and Robbins Arroyo.	0.20
02/08/21	C. Carty	B190	Confer with K. Kolb and H. Zimmer re third party discovery responses and prepare for same.	0.50
02/08/21	C. Carty	B190	Review and analyze hot docs binders related to adversary proceeding.	2.30
02/08/21	K. Kolb	B190	Discuss third party discovery status with C. Carty and H. Zimmer.	0.20
02/08/21	C. Anderson	B110	Review Greenlight/Blackstone document production for relevant documents	1.50
02/08/21	H. Zimmer	B190	Confer with Chris Carty on subpoena to UBS.	0.10
02/08/21	H. Zimmer	B190	Confer with KK and CC on outstanding discovery to Girard Sharp and Robbins and related entities and analyze subpoenas on same.	0.40
02/10/21	C. Carty	B190	Review and analyze hot docs binders related to adversary proceeding.	0.90
02/11/21	C. Carty	B190	Analyze issues related to third party discovery responses.	0.60
02/11/21	K. Kolb	B190	Provide instructions regarding compiling hot documents and summaries of same to complete second level review process.	0.30
02/11/21	K. Kolb	B190	Call with H. Zimmer regarding second level review analysis and process.	0.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
02/11/21	H. Zimmer	B190	Confer with counsel to UBS concerning subpoena, and confer with Chris Carty on same.	0.20
02/11/21	H. Zimmer	B190	Confer with KK and LS concerning summaries of documents reviewed in adversary proceeding and review same.	0.20
02/11/21	H. Zimmer	B190	Confer with counsel to Girard Sharp and Robbins Arroyo in connection with subpoena served on them and their responses.	0.10
02/12/21	H. Zimmer	B190	Confer with KK and LS concerning documents produced in adversary proceeding and summaries of same.	0.20
02/12/21	H. Zimmer	B190	Confer with counsel to UBS concerning subpoena.	0.20
02/12/21	L. Schepp	B190	Compile additional hot documents summaries for attorney review.	3.60
02/15/21	K. Kolb	B190	Analyze draft summaries of key documents produced by Deloitte.	0.20
02/15/21	H. Zimmer	B190	Confer with KK and LS concerning documents produced in adversary proceeding and summaries on same.	0.10
02/16/21	H. Zimmer	B190	Confer with KK and LS concerning documents reviewed in adversary proceeding and summaries on same.	0.30
02/16/21	H. Zimmer	B190	Analyze email from counsel to UBS concerning subpoena.	0.10
02/16/21	L. Schepp	B190	Compile additional hot documents for chronology in preparation for attorney review.	5.80
02/17/21	K. Kolb	B190	Revise compilation of summaries of key documents produced by auditor.	2.30
02/17/21	H. Zimmer	B190	Confer with KK and LS concerning summaries of documents reviewed in adversary proceeding.	0.10
02/17/21	H. Zimmer	B190	Confer with CC concerning UBS subpoena.	0.10
02/17/21	H. Zimmer	B190	Email counsel to UBS concerning subpoena.	0.10
02/18/21	C. Carty	B190	Call with UBS counsel re third party subpoena and prepare for same.	0.60
02/18/21	K. Kolb	B190	Revise and analyze summaries of key documents produced by debtors' auditor.	3.10
02/18/21	H. Zimmer	B190	Call with counsel for UBS concerning subpoena and outstanding responsive documents.	0.30
02/18/21	H. Zimmer	B190	Call with Chris Carty concerning UBS subpoena.	0.10
02/19/21	K. Kolb	B190	Revise summaries of key documents produced by debtors' auditors.	3.40
02/19/21	H. Zimmer	B190	Confer with KK and LS concerning doc summaries and revisions to same.	0.20
02/23/21	C. Carty	B190	Attend telephonic hearing regarding interim fee applications and motion to consolidate adversary	1.50



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			proceedings.	
02/24/21	L. Schepp	B190	Compile additional interesting documents for inclusion in chronology in preparation for attorney review.	2.50
02/25/21	C. Carty	B190	Confer with D. Chapman regarding case status update and provide internal update.	0.50
02/25/21	H. Zimmer	B190	Confer with CC concerning status of litigation with regard to information from hearing.	0.10
TOTAL				\$25,950.00



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Invoice Number: 544218
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Anderson	3.80	435.00	1,653.00
C. Carty	11.10	850.00	9,435.00
K. Kolb	13.30	690.00	9,177.00
L. Schepp	11.90	350.00	4,165.00
H. Zimmer	3.20	475.00	1,520.00
TOTAL	43.30		\$25,950.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
358158	08/24/20	114,394.47	91,935.87	22,458.60
538312	10/22/20	330,797.92	265,261.82	65,536.10
539161	11/12/20	221,704.24	177,615.54	44,088.70
540525	12/14/20	170,056.45	136,138.75	33,917.70
541328	01/19/21	106,056.50	0.00	106,056.50
542909	02/24/21	178,642.76	0.00	178,642.76
			Total Outstanding	\$450,700.36



Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

April 30, 2021
Invoice Number: 545916
Matter Number: 19609.0002

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through March 31, 2021	\$21,351.50
Expenses posted through March 31, 2021	70.00
TOTAL	<u>\$21,421.50</u>
Unpaid balance from previous invoice(s)	\$476,650.36
Total Due Now	\$498,071.86

INVOICE PAYMENT IS DUE UPON RECEIPT. THANK YOU.

Kindly return this page with your check payment to:
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33



HERRICK

Invoice Number: 545916
Matter Number: 19609.0002
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
03/01/21	C. Carty	B190	Call with Akin regarding adversary proceeding update and prepare for same.	0.50
03/03/21	H. Zimmer	B190	Confer with counsel for Girard Sharp concerning subpoena.	0.10
03/05/21	H. Zimmer	B190	Revise memoranda on documents produced in adversary proceeding.	3.10
03/08/21	K. Kolb	B190	Revise summaries of Deloitte documents.	0.30
03/08/21	L. Schepp	B190	Compile and update chronology of additional documents of interest in preparation for attorney review.	4.30
03/11/21	K. Kolb	B190	Analyze proposed revisions to deposition document summaries.	0.10
03/11/21	L. Schepp	B190	Update Deloitte hot and interesting documents index in preparation for attorney review.	1.20
03/12/21	H. Zimmer	B190	Revise summary of documents produced in adversary proceeding.	0.40
03/12/21	H. Zimmer	B190	Review documents produced by Deloitte in adversary proceeding and revise summary on same.	0.80
03/12/21	L. Schepp	B190	Compile additional hot or interesting documents from attorney review of Deloitte documents in preparation for attorney review.	1.10
03/15/21	K. Kolb	B190	Analyze revised scheduling order.	0.20
03/16/21	K. Kolb	B190	Analyze letter to court on case law development.	0.10
03/16/21	K. Kolb	B190	Analyze summaries of key documents produced by debtors' auditors.	0.50
03/16/21	C. Anderson	B190	Review Greenlight/Blackstone production for relevant documents	4.20
03/16/21	H. Zimmer	B190	Confer with Linda Schepp and Kyle Kolb on documents produced in adversary proceeding.	0.10
03/16/21	L. Schepp	B190	Update documents cited in Deloitte hot and of interest documents in preparation for attorney review.	2.90
03/17/21	C. Carty	B190	Review and analyze hot docs from Deloitte third party production.	3.20
03/17/21	K. Kolb	B190	Analyze letter from ESL's counsel.	0.10
03/17/21	C. Anderson	B190	Review Greenlight/Blackstone production for relevant documents	3.70
03/17/21	C. Anderson	B190	Analyze and summarize Greenlight/Blackstone document production	0.40
03/17/21	C. Anderson	B190	Review Greenlight/Blackstone production for relevant	1.10



HERRICK

Invoice Number: 545916
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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
			documents	
03/17/21	H. Zimmer	B190	Review documents produced in adversary proceeding and finalize summary on same.	1.10
03/17/21	L. Schepp	B190	Finalize remaining hot and interesting documents from review of Wachtell and Deloitte produced documents in preparation for attorney review.	0.60
03/18/21	K. Kolb	B190	Revise memo regarding Blackstone production.	0.50
03/18/21	C. Anderson	B190	Draft Summary of Greenlight/Blackstone production.	1.40
03/19/21	H. Zimmer	B190	Review documents produced in adversary proceeding and draft memoranda on same.	3.50
03/22/21	H. Zimmer	B190	Review documents produced in adversary proceeding.	0.60
03/22/21	H. Zimmer	B190	Revise summary on documents produced in adversary proceeding.	0.50
03/24/21	K. Kolb	B190	Analyze Blackstone production and revise memo summarizing same.	2.30
03/25/21	K. Kolb	B190	Analyze Blackstone production and summary of same.	0.50
03/29/21	K. Kolb	B190	Analyze documents produced by Blackstone and revise memo re same.	1.00
03/29/21	H. Zimmer	B190	Analyze emails and productions from third-parties and defendants concerning discovery .	0.50
03/30/21	K. Kolb	B190	Revise memo regarding Blackstone production.	0.80
03/30/21	H. Zimmer	B190	Draft summary on discovery for litigation designees and confer with Chris Carty on same.	0.80
03/31/21	H. Zimmer	B190	Confer with H5 on third party productions.	0.20
			TOTAL	\$21,351.50



HERRICK

Invoice Number: 545916
Matter Number: 19609.0002
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Anderson	10.80	435.00	4,698.00
C. Carty	3.70	850.00	3,145.00
K. Kolb	6.40	690.00	4,416.00
L. Schepp	10.10	350.00	3,535.00
H. Zimmer	11.70	475.00	5,557.50
TOTAL	42.70		\$21,351.50

DISBURSEMENTS:

	<u>AMOUNT</u>
Other	70.00
TOTAL:	<u>\$70.00</u>

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
358158	08/24/20	114,394.47	91,935.87	22,458.60
538312	10/22/20	330,797.92	265,261.82	65,536.10
539161	11/12/20	221,704.24	177,615.54	44,088.70
540525	12/14/20	170,056.45	136,138.75	33,917.70
541328	01/19/21	106,056.50	0.00	106,056.50
542909	02/24/21	178,642.76	0.00	178,642.76
544218	03/25/21	25,950.00	0.00	25,950.00
Total Outstanding				\$476,650.36



HERRICK

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

May 25, 2021
Invoice Number: 546769
Matter Number: 19609.0002

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through April 30, 2021	\$4,159.00
Expenses posted through April 30, 2021	6.90
TOTAL	<u>\$4,165.90</u>
Unpaid balance from previous invoice(s)	\$498,071.86
Total Due Now	\$502,237.76

INVOICE PAYMENT IS DUE UPON RECEIPT. THANK YOU.

Kindly return this page with your check payment to:
Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33



HERRICK

Invoice Number: 546769
Matter Number: 19609.0002
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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
04/06/21	C. Carty	B190	Draft update for Litigation Designees on workstreams in connection with adversary proceeding and analyze issues related to same.	2.40
04/15/21	H. Zimmer	B190	Review document stipulation.	0.20
04/16/21	C. Carty	B190	Analyze documents produced in discovery in adversary proceeding.	0.50
04/16/21	H. Zimmer	B190	Review documents produced in adversary proceeding and confer with Chris Carty on same.	0.40
04/16/21	L. Schepp	B190	Discussion with H. Zimmer regarding various WLRK document productions.	0.40
04/19/21	C. Carty	B190	Correspondence regarding document sharing stipulation.	0.20
04/22/21	C. Carty	B190	Analyze hot document binders from document review.	0.80
04/22/21	K. Kolb	B190	Email regarding prior hot document summaries.	0.10
04/22/21	H. Zimmer	B190	Confer with Linda Schepp, Kyle Kolb, and Chris Carty concerning documents produced in adversary proceeding.	0.40
			TOTAL	\$3,999.00



HERRICK

Invoice Number: 546769
Matter Number: 19609.0002
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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	3.90	850.00	3,315.00
K. Kolb	0.10	690.00	69.00
L. Schepp	0.40	350.00	140.00
H. Zimmer	1.00	475.00	475.00
TOTAL	5.40		\$3,999.00

E-DISCOVERY & LITIGATION SUPPORT SERVICES

Project Management	160.00
TOTAL	\$160.00

TOTAL LEGAL SERVICES **\$4,159.00**

DISBURSEMENTS:

	<u>AMOUNT</u>
Pacer Charges	6.90
TOTAL:	\$6.90

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
358158	08/24/20	114,394.47	91,935.87	22,458.60
538312	10/22/20	330,797.92	265,261.82	65,536.10
539161	11/12/20	221,704.24	177,615.54	44,088.70
540525	12/14/20	170,056.45	136,138.75	33,917.70
541328	01/19/21	106,056.50	0.00	106,056.50
542909	02/24/21	178,642.76	0.00	178,642.76
544218	03/25/21	25,950.00	0.00	25,950.00
545916	04/30/21	21,421.50	0.00	21,421.50
Total Outstanding				\$498,071.86



HERRICK

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

December 6, 2021
Invoice Number: 556494
Matter Number: 19609.0002

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through November 30, 2021 \$737.50

TOTAL \$737.50

Unpaid balance from previous invoice(s) \$5,102.10

Total Due Now \$5,839.60

We would very much appreciate receiving payment by December 30th since our fiscal year ends on December 31st. Happy Holidays and thank you very much.

Kindly return this page with your
check payment to:
Herrick, Feinstein LLP
Attn: Billing Department
2 Park Avenue
New York, NY 10016

Send **wire or ACH payments to:**
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

Credit card payments:
www.herrickpay.com
*URL/link redirects to our
processor SlimCD*



HERRICK

Invoice Number: 556494
Matter Number: 19609.0002
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
11/29/21	C. Carty	B190	Call with Debtors' preference counsel re potential fraudulent transfer claim related to insider adversary proceeding (0.2); review and analyze documents sent by Debtors' preference counsel (0.5).	0.70
11/29/21	H. Zimmer	B190	Confer with Chris Carty on related party transactions.	0.30
TOTAL				\$737.50

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	0.70	850.00	595.00
H. Zimmer	0.30	475.00	142.50
TOTAL	1.00		\$737.50

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
545916	04/30/21	21,421.50	17,151.20	4,270.30
546769	05/25/21	4,165.90	3,334.10	831.80
Total Outstanding				\$5,102.10



HERRICK

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

January 31, 2022
Invoice Number: 559070
Matter Number: 19609.0002

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through December 31, 2021	\$1,530.00
TOTAL	<u>\$1,530.00</u>
Unpaid balance from previous invoice(s)	\$5,839.60
Total Due Now	\$7,369.60

INVOICE PAYMENT IS DUE UPON RECEIPT. THANK YOU.

Kindly return this page with your
check payment to:
Herrick, Feinstein LLP
Attn: Billing Department
2 Park Avenue
New York, NY 10016

Send **wire or ACH payments to:**
Citibank, N.A.
ABA Number: 0089
Account Number: 6165
SWIFT #: US33

Credit card payments:
www.herrickpay.com
*URL/link redirects to our
processor SlimCD*



HERRICK

Invoice Number: 559070
Matter Number: 19609.0002
Page: 2

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
12/01/21	C. Carty	B190	Review debtor draft settlement agreement in preference action to analyze impact on adversary proceeding.	1.20
12/02/21	C. Carty	B190	Review debtor draft settlement agreement in preference action to analyze impact on adversary proceeding.	0.60
TOTAL				\$1,530.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	1.80	850.00	1,530.00
TOTAL	1.80		\$1,530.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
545916	04/30/21	21,421.50	17,151.20	4,270.30
546769	05/25/21	4,165.90	3,334.10	831.80
556494	12/06/21	737.50	0.00	737.50
Total Outstanding				\$5,839.60

EXHIBIT F-1

**SUMMARY OF EXPENSES BY CATEGORY FOR THE EIGHTH INTERIM
COMPENSATION PERIOD**

Description	Amount billed
Document Processing	\$7.10
E-Discovery Data Hosting Minimum Charge	\$400.00
Total	\$407.10

EXHIBIT F-2

**SUMMARY OF EXPENSES BY CATEGORY FOR
THE FINAL COMPENSATION PERIOD**

Description	Amount billed
Blackberry Service	\$16.99
Color Duplicating	\$1,062.32
Document Processing	\$1,472.88
Duplicating Supplies	\$437.31
E-copy	\$356.76
E-Discovery Data Hosting per minimum charge	\$4,000.00
E Discovery Data Hosting per gig charge	\$60.00
Expert Witness Fees	\$352,865.00
Library research	\$18.00
Local travel	\$154.50
Meals	\$236.51
Messenger	\$65.50
Miscellaneous	\$140.00
Online research	\$9,808.03
Office supplies	\$13.16
Out of town accommodations	\$552.12
Overtime	\$189.00
Pacer charges	\$801.40
Photocopies	\$14.58
Printing blowback	\$6,109.62
Printing	\$994.68
Process servers	\$3,375.32
Shipping	\$783.42
Teleconferencing	\$547.00
Velobind/binding	\$172.00
Total	\$384,219.78

EXHIBIT G

ITEMIZED EXPENSES FOR THE FINAL COMPENSATION PERIOD

Client: Official Committee of Unsecured Creditor (19609)							
WIP Status: Billed (B)							
Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured	2/18/2019	Blackberry Service (060)	UNITED AIRLINES HOUSTON TX TKT# 01615029452809 A RLINE/AIR	341824	1.00	\$16.99	6/5/2019
Total Blackberry						\$16.99	
Official Committee of Unsecured	2/13/2019	Color Duplicating (036)	Color Duplicating	341824	1.00	\$0.22	6/5/2019
Official Committee of Unsecured	2/13/2019	Color Duplicating (036)	Color Duplicating	341824	1.00	\$0.22	6/5/2019
Official Committee of Unsecured	2/13/2019	Color Duplicating (036)	Color Duplicating	341824	1.00	\$0.22	6/5/2019
Official Committee of Unsecured	2/19/2019	Color Duplicating (036)	Color Duplicating	341824	2.00	\$0.44	6/5/2019
Official Committee of Unsecured	2/21/2019	Color Duplicating (036)	Color Duplicating	341824	6.00	\$1.32	6/5/2019
Official Committee of Unsecured	2/21/2019	Color Duplicating (036)	Color Duplicating	341824	8.00	\$1.76	6/5/2019
Official Committee of Unsecured	5/23/2021	Color Duplicating (036)	Color Duplicating	547628	12.00	\$2.64	6/16/2021
Official Committee of Unsecured	1/15/2019	Color Duplicating (036)	Color Duplicating	341824	8.00	\$2.80	6/5/2019
Official Committee of Unsecured	6/2/2020	Color Duplicating (036)	Color Duplicating	356648	14.00	\$3.08	7/16/2020
Official Committee of Unsecured	1/14/2020	Color Duplicating (036)	Color Duplicating	352222	35.00	\$7.70	3/13/2020
Official Committee of Unsecured	7/8/2021	Color Duplicating (036)	Color Duplicating	550688	64.00	\$14.08	8/23/2021
Official Committee of Unsecured	2/10/2020	Color Duplicating (036)	Color Duplicating	352221	84.00	\$18.48	3/13/2020
Official Committee of Unsecured	8/24/2020	Color Duplicating (036)	Color Duplicating	538312	109.00	\$23.98	10/22/2020
Official Committee of Unsecured	8/5/2020	Color Duplicating (036)	Color Duplicating	538312	144.00	\$31.68	10/22/2020
Official Committee of Unsecured	11/5/2019	Color Duplicating (036)	Color Duplicating	352221	192.00	\$42.24	3/13/2020
Official Committee of Unsecured	12/2/2019	Color Duplicating (036)	Color Duplicating	352222	279.00	\$61.38	3/13/2020
Official Committee of Unsecured	9/2/2020	Color Duplicating (036)	Color Duplicating	538311	368.00	\$80.96	10/22/2020
Official Committee of Unsecured	9/2/2020	Color Duplicating (036)	Color Duplicating	538311	368.00	\$80.96	10/22/2020
Official Committee of Unsecured	9/1/2020	Color Duplicating (036)	Color Duplicating	538311	376.00	\$82.72	10/22/2020
Official Committee of Unsecured	9/1/2020	Color Duplicating (036)	Color Duplicating	538311	376.00	\$82.72	10/22/2020
Official Committee of Unsecured	9/1/2020	Color Duplicating (036)	Color Duplicating	538311	1,188.00	\$261.36	10/22/2020
Official Committee of Unsecured	9/1/2020	Color Duplicating (036)	Color Duplicating	538311	1,188.00	\$261.36	10/22/2020
Total Color Duplicating						\$1,062.32	
Official Committee of Unsecured	5/14/2020	Document Processing (105)	Williams Lea - WP Job # - 106049 - Requested By - Poretsky, Larisa	356215	1.00	\$12.00	6/30/2020
Official Committee of Unsecured	1/4/2022	Document Processing (105)	Vendor: Williams Lea Inc.; Invoice#: US004-180022183; Date: 1/4/2022	562340	0.00	\$12.88	4/6/2022
Official Committee of Unsecured	1/28/2019	Document Processing (105)	Williams Lea - WP Job # - 87307 - Requested By - Poretsky, Larisa De	341824	1.00	\$24.00	6/5/2019
Official Committee of Unsecured	3/15/2019	Document Processing (105)	Williams Lea - WP Job # - 89401 - Requested By - Poretsky, Larisa De	341824	1.00	\$24.00	6/5/2019
Official Committee of Unsecured	12/31/2020	Document Processing (105)	Vendor: Williams Lea Inc.; Invoice#: US004-180009247; Date: 12/31/2020	544217	0.00	\$25.00	3/25/2021
Official Committee of Unsecured	1/24/2019	Document Processing (105)	Williams Lea - WP Job # - 87174 - Requested By - Poretsky, Larisa De	341824	1.00	\$36.00	6/5/2019
Official Committee of Unsecured	2/12/2019	Document Processing (105)	Williams Lea - WP Job # - 87979 - Requested By - Poretsky, Larisa De	341824	1.00	\$36.00	6/5/2019
Official Committee of Unsecured	1/28/2019	Document Processing (105)	Williams Lea - WP Job # - 87319 - Requested By - Poretsky, Larisa De	341824	1.00	\$36.00	6/5/2019
Official Committee of Unsecured	4/23/2020	Document Processing (105)	Williams Lea - WP Job # - 105440 - Requested By - Poretsky, Larisa	355261	1.00	\$36.00	5/29/2020
Official Committee of Unsecured	12/31/2020	Document Processing (105)	Vendor: Williams Lea Inc.; Invoice#: US004-180009247; Date: 12/31/2020	544217	0.00	\$37.50	3/25/2021
Official Committee of Unsecured	12/31/2020	Document Processing (105)	Vendor: Williams Lea Inc.; Invoice#: US004-180009247; Date: 12/31/2020	544217	0.00	\$37.50	3/25/2021
Official Committee of Unsecured	3/14/2019	Document Processing (105)	Williams Lea - WP Job # - 89342 - Requested By - Poretsky, Larisa De	341824	1.00	\$48.00	6/5/2019
Official Committee of Unsecured	2/27/2020	Document Processing (105)	Williams Lea - WP Job # - 103356 - Requested By - Kolb, Kyle Descri	352222	1.00	\$48.00	3/13/2020
Official Committee of Unsecured	4/24/2020	Document Processing (105)	Williams Lea - WP Job # - 105467 - Requested By - Poretsky, Larisa	355261	1.00	\$48.00	5/29/2020
Official Committee of Unsecured	1/24/2019	Document Processing (105)	Williams Lea - WP Job # - 87155 - Requested By - Poretsky, Larisa De	341824	1.00	\$60.00	6/5/2019
Official Committee of Unsecured	4/24/2020	Document Processing (105)	Williams Lea - WP Job # - 105470 - Requested By - Poretsky, Larisa	355261	1.00	\$72.00	5/29/2020
Official Committee of Unsecured	6/17/2020	Document Processing (105)	Williams Lea - WP Job # - 106985 - Requested By - Kolb, Kyle Descri	356647	1.00	\$75.00	7/16/2020
Official Committee of Unsecured	6/17/2020	Document Processing (105)	Williams Lea - WP Job # - 106988 - Requested By - Kolb, Kyle Descri	356647	1.00	\$75.00	7/16/2020
Official Committee of Unsecured	10/2/2020	Document Processing (105)	Vendor: Williams Lea Inc.; Invoice#: SEPT2020; Date: 10/2/2020	538312	0.00	\$75.00	10/22/2020
Official Committee of Unsecured	6/17/2020	Document Processing (105)	Williams Lea - WP Job # - 106987 - Requested By - Kolb, Kyle Descri	356647	1.00	\$87.50	7/16/2020
Official Committee of Unsecured	6/24/2020	Document Processing (105)	Williams Lea - WP Job # - 107185 - Requested By - Fromer, Gabriell	356648	1.00	\$87.50	7/16/2020
Official Committee of Unsecured	2/8/2020	Document Processing (105)	Williams Lea - WP Job # - 102553 - Requested By - Kolb, Kyle Descri	352221	1.00	\$96.00	3/13/2020
Official Committee of Unsecured	4/25/2020	Document Processing (105)	Williams Lea - WP Job # - 105483 - Requested By - Poretsky, Larisa	355261	1.00	\$108.00	5/29/2020
Official Committee of Unsecured	2/20/2019	Document Processing (105)	Williams Lea - WP Job # - 88335 - Requested By - Riley, Jean Descrip	341824	1.00	\$120.00	6/5/2019
Official Committee of Unsecured	4/6/2019	Document Processing (105)	Williams Lea - WP Job # - 90341 - Requested By - Poretsky, Larisa De	342519	1.00	\$156.00	6/21/2019
Total Document Processing						\$1,472.88	
Official Committee of Unsecured	2/12/2019	Duplicating Supplies (020)	Duplicating Supplies	341824	4.00	\$0.40	6/5/2019
Official Committee of Unsecured	2/12/2019	Duplicating Supplies (020)	Duplicating Supplies	341824	5.00	\$0.50	6/5/2019
Official Committee of Unsecured	1/15/2019	Duplicating Supplies (020)	Duplicating Supplies	341824	8.00	\$0.80	6/5/2019
Official Committee of Unsecured	2/8/2019	Duplicating Supplies (020)	Duplicating Supplies	341824	10.00	\$1.00	6/5/2019
Official Committee of Unsecured	8/24/2020	Duplicating Supplies (020)	Duplicating Supplies	538312	11.00	\$1.32	10/22/2020
Official Committee of Unsecured	2/28/2020	Duplicating Supplies (020)	Duplicating Supplies	352221	12.00	\$1.44	3/13/2020
Official Committee of Unsecured	2/12/2019	Duplicating Supplies (020)	Duplicating Supplies	341824	16.00	\$1.60	6/5/2019

Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured Creditors	2/27/2019	Duplicating Supplies (020)	Duplicating Supplies	341824	20.00	\$2.00	6/5/2019
Official Committee of Unsecured Creditors	3/11/2020	Duplicating Supplies (020)	Duplicating Supplies	354103	18.00	\$2.16	4/20/2020
Official Committee of Unsecured Creditors	2/12/2019	Duplicating Supplies (020)	Duplicating Supplies	341824	24.00	\$2.40	6/5/2019
Official Committee of Unsecured Creditors	11/19/2019	Duplicating Supplies (020)	Duplicating Supplies	352222	1.00	\$2.99	3/13/2020
Official Committee of Unsecured Creditors	3/11/2020	Duplicating Supplies (020)	Duplicating Supplies	354103	1.00	\$3.36	4/20/2020
Official Committee of Unsecured Creditors	2/27/2019	Duplicating Supplies (020)	Duplicating Supplies	341824	1.00	\$3.49	6/5/2019
Official Committee of Unsecured Creditors	1/22/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	1.00	\$3.82	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	1.00	\$3.82	3/13/2020
Official Committee of Unsecured Creditors	1/30/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	1.00	\$3.82	3/13/2020
Official Committee of Unsecured Creditors	3/9/2020	Duplicating Supplies (020)	Duplicating Supplies	354103	1.00	\$3.82	4/20/2020
Official Committee of Unsecured Creditors	9/1/2020	Duplicating Supplies (020)	Duplicating Supplies	538311	1.00	\$3.82	10/22/2020
Official Committee of Unsecured Creditors	9/1/2020	Duplicating Supplies (020)	Duplicating Supplies	538311	1.00	\$3.82	10/22/2020
Official Committee of Unsecured Creditors	6/5/2020	Duplicating Supplies (020)	Duplicating Supplies	356648	34.00	\$4.08	7/16/2020
Official Committee of Unsecured Creditors	6/5/2020	Duplicating Supplies (020)	Duplicating Supplies	356648	34.00	\$4.08	7/16/2020
Official Committee of Unsecured Creditors	9/2/2020	Duplicating Supplies (020)	Duplicating Supplies	538311	39.00	\$4.68	10/22/2020
Official Committee of Unsecured Creditors	9/2/2020	Duplicating Supplies (020)	Duplicating Supplies	538311	39.00	\$4.68	10/22/2020
Official Committee of Unsecured Creditors	2/10/2020	Duplicating Supplies (020)	Duplicating Supplies	352221	40.00	\$4.80	3/13/2020
Official Committee of Unsecured Creditors	5/23/2021	Duplicating Supplies (020)	Duplicating Supplies	547628	41.00	\$4.92	6/16/2021
Official Committee of Unsecured Creditors	8/25/2020	Duplicating Supplies (020)	Duplicating Supplies	538312	50.00	\$6.00	10/22/2020
Official Committee of Unsecured Creditors	12/18/2019	Duplicating Supplies (020)	Duplicating Supplies	352222	2.00	\$6.72	3/13/2020
Official Committee of Unsecured Creditors	2/8/2019	Duplicating Supplies (020)	Duplicating Supplies	341824	2.00	\$6.98	6/5/2019
Official Committee of Unsecured Creditors	1/21/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	59.00	\$7.08	3/13/2020
Official Committee of Unsecured Creditors	1/21/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	59.00	\$7.08	3/13/2020
Official Committee of Unsecured Creditors	1/21/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	1.00	\$7.22	3/13/2020
Official Committee of Unsecured Creditors	1/21/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	1.00	\$7.22	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	1.00	\$7.22	3/13/2020
Official Committee of Unsecured Creditors	1/22/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	1.00	\$7.23	3/13/2020
Official Committee of Unsecured Creditors	2/12/2019	Duplicating Supplies (020)	Duplicating Supplies	341824	2.00	\$7.50	6/5/2019
Official Committee of Unsecured Creditors	4/2/2020	Duplicating Supplies (020)	Duplicating Supplies	356647	3.00	\$10.08	7/16/2020
Official Committee of Unsecured Creditors	1/21/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	99.00	\$11.88	3/13/2020
Official Committee of Unsecured Creditors	9/1/2020	Duplicating Supplies (020)	Duplicating Supplies	538311	117.00	\$14.04	10/22/2020
Official Committee of Unsecured Creditors	9/1/2020	Duplicating Supplies (020)	Duplicating Supplies	538311	117.00	\$14.04	10/22/2020
Official Committee of Unsecured Creditors	1/21/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	2.00	\$14.44	3/13/2020
Official Committee of Unsecured Creditors	1/22/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	158.00	\$18.96	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	Duplicating Supplies (020)	Duplicating Supplies	352222	158.00	\$18.96	3/13/2020
Official Committee of Unsecured Creditors	7/8/2021	Duplicating Supplies (020)	Duplicating Supplies	550688	164.00	\$19.68	8/23/2021
Official Committee of Unsecured Creditors	4/2/2020	Duplicating Supplies (020)	Duplicating Supplies	356647	180.00	\$21.60	7/16/2020
Official Committee of Unsecured Creditors	9/1/2020	Duplicating Supplies (020)	Duplicating Supplies	538311	321.00	\$38.52	10/22/2020
Official Committee of Unsecured Creditors	9/1/2020	Duplicating Supplies (020)	Duplicating Supplies	538311	321.00	\$38.52	10/22/2020
Official Committee of Unsecured Creditors	8/5/2020	Duplicating Supplies (020)	Duplicating Supplies	538312	606.00	\$72.72	10/22/2020
Total Duplicating Supplies						\$437.31	
Official Committee of Unsecured Creditors	1/15/2019	e-Copy (Scan) (067)	E-copy scan made by Jean Riley On Unit Number: 2588	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	1/28/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 721 was delivered to "LPoretzsky@herrick.com"	346307	1.00	\$0.18	9/30/2019
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 16410 was delivered to "LSchepp@herrick.com"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9897 was delivered to "\\herrick.com\shared\9897"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9900 was delivered to "\\herrick.com\shared\9900"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9923 was delivered to "\\herrick.com\shared\9923"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9924 was delivered to "\\herrick.com\shared\9924"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9925 was delivered to "\\herrick.com\shared\9925"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9926 was delivered to "\\herrick.com\shared\9926"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9931 was delivered to "\\herrick.com\shared\9931"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9932 was delivered to "\\herrick.com\shared\9932"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9934 was delivered to "\\herrick.com\shared\9934"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9943 was delivered to "\\herrick.com\shared\9943"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9989 was delivered to "\\herrick.com\shared\9989"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9991 was delivered to "\\herrick.com\shared\9991"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9993 was delivered to "\\herrick.com\shared\9993"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9995 was delivered to "\\herrick.com\shared\9995"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9997 was delivered to "\\herrick.com\shared\9997"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9999 was delivered to "\\herrick.com\shared\9999"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 10001 was delivered to "\\herrick.com\shared\10001"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 10003 was delivered to "\\herrick.com\shared\10003"	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 10005 was delivered to "\\herrick.com\shared\10005"	352221	1.00	\$0.18	3/13/2020

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Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 10109 was delivered to "\\herrick.com\	352221	3.00	\$0.54	3/13/2020
Official Committee of Unsecured Creditors	1/16/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 16121 was delivered to "HZimmer@herri	352222	3.00	\$0.54	3/13/2020
Official Committee of Unsecured Creditors	1/16/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 16122 was delivered to "HZimmer@herri	352222	3.00	\$0.54	3/13/2020
Official Committee of Unsecured Creditors	3/9/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 18554 was delivered to "KKolb@herrick.	354103	3.00	\$0.54	4/20/2020
Official Committee of Unsecured Creditors	3/9/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 18555 was delivered to "KKolb@herrick.	354103	3.00	\$0.54	4/20/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9896 was delivered to "\\herrick.com\	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9908 was delivered to "\\herrick.com\	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9909 was delivered to "\\herrick.com\	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9910 was delivered to "\\herrick.com\	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 10110 was delivered to "\\herrick.com\	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9978 was delivered to "\\herrick.com\	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 10054 was delivered to "\\herrick.com\	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	1/27/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 16539 was delivered to "LSchepp@herri	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	1/27/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 16540 was delivered to "LSchepp@herri	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	1/27/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 16500 was delivered to "LSchepp@herri	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	1/13/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 15902 was delivered to "DKopf@herrick	352222	5.00	\$0.90	3/13/2020
Official Committee of Unsecured Creditors	1/17/2019	e-Copy (Scan) (067)	E-copy scan made by Larisa Poretsky On Unit Number: 2588	341824	7.00	\$1.26	6/5/2019
Official Committee of Unsecured Creditors	1/17/2019	e-Copy (Scan) (067)	E-copy scan made by Larisa Poretsky On Unit Number: 2588	341824	7.00	\$1.26	6/5/2019
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9935 was delivered to "\\herrick.com\	352221	7.00	\$1.26	3/13/2020
Official Committee of Unsecured Creditors	3/17/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 19018 was delivered to "JRiley@herrick.	354102	10.00	\$1.80	4/20/2020
Official Committee of Unsecured Creditors	7/1/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 19176 was delivered to "KKolb@herrick.	358158	10.00	\$1.80	8/24/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9898 was delivered to "\\herrick.com\	352221	14.00	\$2.52	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9936 was delivered to "\\herrick.com\	352221	14.00	\$2.52	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9950 was delivered to "\\herrick.com\	352221	14.00	\$2.52	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9956 was delivered to "\\herrick.com\	352221	14.00	\$2.52	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 9957 was delivered to "\\herrick.com\	352221	14.00	\$2.52	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 10049 was delivered to "\\herrick.com\	352221	14.00	\$2.52	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 10050 was delivered to "\\herrick.com\	352221	14.00	\$2.52	3/13/2020
Official Committee of Unsecured Creditors	1/17/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 16172 was delivered to "JCall@herrick.c	352221	16.00	\$2.88	3/13/2020
Official Committee of Unsecured Creditors	2/28/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1295 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	2/28/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1242 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	3/4/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1439 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	3/4/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1440 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1179 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1180 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1181 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1182 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1183 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1184 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 1185 was delivered to "SSmith@herrick.	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	3/27/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 2595 was delivered to "LPoretsky@herri	341824	20.00	\$3.60	6/5/2019
Official Committee of Unsecured Creditors	3/17/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 19019 was delivered to "JRiley@herrick.	354102	20.00	\$3.60	4/20/2020
Official Committee of Unsecured Creditors	12/16/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 14813 was delivered to "JCall@herrick.c	352222	21.00	\$3.78	3/13/2020
Official Committee of Unsecured Creditors	11/25/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 13903 was delivered to "LPoretsky@her	352221	30.00	\$5.40	3/13/2020
Official Committee of Unsecured Creditors	7/15/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 7477 was delivered to "LPoretsky@herri	346307	43.00	\$7.74	9/30/2019
Official Committee of Unsecured Creditors	2/26/2019	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 1393 was delivered to "\\herrick.com\	341824	46.00	\$8.28	6/5/2019
Official Committee of Unsecured Creditors	2/21/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 2671 was delivered to "LPoretsky@herri	346307	46.00	\$8.28	9/30/2019
Official Committee of Unsecured Creditors	2/13/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 2019 was delivered to "LPoretsky@herri	346307	46.00	\$8.28	9/30/2019
Official Committee of Unsecured Creditors	11/12/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 13242 was delivered to "LPoretsky@her	352221	52.00	\$9.36	3/13/2020
Official Committee of Unsecured Creditors	1/31/2020	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 16790 was delivered to "JCall@herrick.c	352221	76.00	\$13.68	3/13/2020
Official Committee of Unsecured Creditors	4/24/2019	e-Copy (Scan) (067)	E-copy Scan to Email Job ID 2695 was delivered to "PBMS@herrick.c	342519	79.00	\$14.22	6/21/2019
Official Committee of Unsecured Creditors	5/2/2019	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 3317 was delivered to "\\herrick.com\	342519	82.00	\$14.76	6/21/2019
Official Committee of Unsecured Creditors	5/2/2019	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 3315 was delivered to "\\herrick.com\	342519	150.00	\$27.00	6/21/2019
Official Committee of Unsecured Creditors	5/2/2019	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 3318 was delivered to "\\herrick.com\	342519	240.00	\$43.20	6/21/2019
Official Committee of Unsecured Creditors	5/2/2019	e-Copy (Scan) (067)	E-copy Scan to Folder Job ID 3314 was delivered to "\\herrick.com\	342519	260.00	\$46.80	6/21/2019
Total Ecopsy						\$356.76	
Official Committee of Unsecured Creditors	3/31/2019	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge	342519	1.00	\$100.00	6/21/2019
Official Committee of Unsecured Creditors	4/30/2019	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 1432722 Case	342519	1.00	\$100.00	6/21/2019
Official Committee of Unsecured Creditors	5/31/2019	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 1432722 Case	342519	1.00	\$100.00	6/21/2019
Official Committee of Unsecured Creditors	6/30/2019	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 1432722 Case	346307	1.00	\$100.00	9/30/2019
Official Committee of Unsecured Creditors	7/31/2019	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 1432722 Case	346307	1.00	\$100.00	9/30/2019
Official Committee of Unsecured Creditors	8/31/2019	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 1432722 Case	346307	1.00	\$100.00	9/30/2019
Official Committee of Unsecured Creditors	9/30/2019	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 1432722 Case	348033	1.00	\$100.00	11/18/2019

Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured Creditors	10/31/2019	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 1432722 Case	348033	1.00	\$100.00	11/18/2019
Official Committee of Unsecured Creditors	11/30/2019	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 1432722 Case	352221	1.00	\$100.00	3/13/2020
Official Committee of Unsecured Creditors	12/31/2019	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 2550283 Case	352221	1.00	\$100.00	3/13/2020
Official Committee of Unsecured Creditors	1/31/2020	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 2550283 Case	352221	1.00	\$100.00	3/13/2020
Official Committee of Unsecured Creditors	2/29/2020	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 2550283 Case	352221	1.00	\$100.00	3/13/2020
Official Committee of Unsecured Creditors	3/31/2020	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 2550283 Case	354102	1.00	\$100.00	4/20/2020
Official Committee of Unsecured Creditors	4/30/2020	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 2550283 Case	355261	1.00	\$100.00	5/29/2020
Official Committee of Unsecured Creditors	5/31/2020	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 2550283 Case	356215	1.00	\$100.00	6/30/2020
Official Committee of Unsecured Creditors	6/30/2020	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 2550283 Case	356647	1.00	\$100.00	7/16/2020
Official Committee of Unsecured Creditors	7/31/2020	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 2550283 Case	358157	1.00	\$100.00	8/24/2020
Official Committee of Unsecured Creditors	8/31/2020	E-Discovery Data Hosting Minimum Charge	E-Discovery Data Hosting Minimum Charge Case ID: 2550283 Case	538311	1.00	\$100.00	10/22/2020
Official Committee of Unsecured Creditors	9/30/2020	E-Discovery Data Hosting Minimum Charge	Simon Property Group - Sears Bankruptcy	538311	1.00	\$100.00	10/22/2020
Official Committee of Unsecured Creditors	10/31/2020	E-Discovery Data Hosting Minimum Charge	Simon Property Group - Sears Bankruptcy	539160	1.00	\$100.00	11/12/2020
Official Committee of Unsecured Creditors	11/30/2020	E-Discovery Data Hosting Minimum Charge	Simon Property Group - Sears Bankruptcy	540575	1.00	\$100.00	12/14/2020
Official Committee of Unsecured Creditors	12/31/2020	E-Discovery Data Hosting Minimum Charge	Simon Property Group - Sears Bankruptcy	541327	1.00	\$100.00	1/19/2021
Official Committee of Unsecured Creditors	1/31/2021	E-Discovery Data Hosting Minimum Charge	Simon Property Group - Sears Bankruptcy	542957	1.00	\$100.00	2/24/2021
Official Committee of Unsecured Creditors	2/28/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN (formerly Simon Property Group)	544217	1.00	\$100.00	3/25/2021
Official Committee of Unsecured Creditors	3/31/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN (formerly Simon Property Group)	545915	1.00	\$100.00	4/30/2021
Official Committee of Unsecured Creditors	4/30/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN (formerly Simon Property Group)	546768	1.00	\$100.00	5/25/2021
Official Committee of Unsecured Creditors	6/3/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN (formerly Simon Property Group)	549157	1.00	\$100.00	7/19/2021
Official Committee of Unsecured Creditors	6/30/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN (formerly Simon Property Group)	549157	1.00	\$100.00	7/19/2021
Official Committee of Unsecured Creditors	7/31/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN (formerly Simon Property Group)	550688	1.00	\$100.00	8/23/2021
Official Committee of Unsecured Creditors	8/31/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN (formerly Simon Property Group)	552265	1.00	\$100.00	9/21/2021
Official Committee of Unsecured Creditors	9/30/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN (formerly Simon Property Group)	553644	1.00	\$100.00	10/18/2021
Official Committee of Unsecured Creditors	10/31/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN	554956	1.00	\$100.00	11/8/2021
Official Committee of Unsecured Creditors	11/30/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN	556493	1.00	\$100.00	12/6/2021
Official Committee of Unsecured Creditors	12/31/2021	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN	559069	1.00	\$100.00	1/31/2022
Official Committee of Unsecured Creditors	1/31/2022	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN	559894	1.00	\$100.00	2/17/2022
Official Committee of Unsecured Creditors	2/28/2022	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN	562340	1.00	\$100.00	4/6/2022
Official Committee of Unsecured Creditors	3/31/2022	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN	563646	1.00	\$100.00	5/2/2022
Official Committee of Unsecured Creditors	4/30/2022	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN	565030	1.00	\$100.00	5/31/2022
Official Committee of Unsecured Creditors	5/31/2022	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN	566702	1.00	\$100.00	7/5/2022
Official Committee of Unsecured Creditors	6/30/2022	E-Discovery Data Hosting Minimum Charge	Sears Bankruptcy UCC - Rule 2004 MTN	568157	1.00	\$100.00	8/1/2022
Total E-Discovery Data Hosting Minimum charge						\$4,000.00	
Official Committee of Unsecured Creditors	9/30/2020	E-Discovery Data Hosting per Gig		538311	1.00	\$15.00	10/22/2020
Official Committee of Unsecured Creditors	10/31/2020	E-Discovery Data Hosting per Gig		539160	1.00	\$15.00	11/12/2020
Official Committee of Unsecured Creditors	11/30/2020	E-Discovery Data Hosting per Gig		540575	1.00	\$15.00	12/14/2020
Official Committee of Unsecured Creditors	12/31/2020	E-Discovery Data Hosting per Gig		541327	1.00	\$15.00	1/19/2021
Total E Discovery Data Hosting per gig charge						\$60.00	
Official Committee of Unsecured Creditors	2/1/2021	Expert Witness Fees (026)	Vendor: Capital Market Risk Advisors; Invoice#: 2021-00282; Date: 2/1/2021	542957	0.00	\$8,770.00	2/24/2021
Official Committee of Unsecured Creditors	8/1/2020	Expert Witness Fees (026)	Expert Witness	358157	1.00	\$9,195.00	8/24/2020
Official Committee of Unsecured Creditors	11/1/2020	Expert Witness Fees (026)	Vendor: Capital Market Risk Advisors; Invoice#: 2020-00268; Date: 11/1/2020	539160	0.00	\$9,195.00	11/12/2020
Official Committee of Unsecured Creditors	7/1/2020	Expert Witness Fees (026)	Expert Witness	356647	1.00	\$10,312.50	7/16/2020
Official Committee of Unsecured Creditors	12/1/2020	Expert Witness Fees (026)	Vendor: Capital Market Risk Advisors; Invoice#: 2020-00272; Date: 12/1/2020	540575	0.00	\$15,075.00	12/14/2020
Official Committee of Unsecured Creditors	1/1/2021	Expert Witness Fees (026)	Vendor: Capital Market Risk Advisors; Invoice#: 2021-00277; Date: 1/1/2021	541327	0.00	\$15,450.00	1/19/2021
Official Committee of Unsecured Creditors	8/1/2021	Expert Witness Fees (026)	Vendor: Capital Market Risk Advisors; Invoice#: 2021-00307; Date: 8/1/2021	550688	0.00	\$29,605.00	8/23/2021
Official Committee of Unsecured Creditors	6/1/2020	Expert Witness Fees (026)	Expert Witness Fee	356215	1.00	\$43,330.00	6/30/2020
Official Committee of Unsecured Creditors	9/1/2020	Expert Witness Fees (026)	Vendor: Capital Market Risk Advisors; Invoice#: 2020-00264; Date: 9/1/2020	538311	0.00	\$44,897.50	10/22/2020
Official Committee of Unsecured Creditors	5/1/2020	Expert Witness Fees (026)	Expert Witness Fee	355261	1.00	\$60,602.50	5/29/2020
Official Committee of Unsecured Creditors	10/1/2020	Expert Witness Fees (026)	Vendor: Capital Market Risk Advisors; Invoice#: 2020-00267; Date: 10/1/2020	538311	0.00	\$106,432.50	10/22/2020
Total Expert Witness Fees						\$352,865.00	
Official Committee of Unsecured Creditors	11/2/2020	Library Research (024)	Case pull: Cementation Piling v. Aegon; Requested 10/6/20.	540525	0.00	\$18.00	12/14/2020
Total library research						\$18.00	
Official Committee of Unsecured Creditors	2/11/2019	Local travel - taxi, tolls, parking, etc.	Travel expense from airport re attendance at Marblegate - Mid-Winter	341824	1.00	\$154.50	6/5/2019
Total local travel						\$154.50	
Official Committee of Unsecured Creditors	1/28/2019	Meals (029)	Late night working dinner.	341824	1.00	\$20.22	6/5/2019
Official Committee of Unsecured Creditors	3/9/2020	Meals (029)	Late night working dinner re: document review.	354103	1.00	\$22.48	4/20/2020
Official Committee of Unsecured Creditors	1/22/2019	Meals (029)	Late night working dinner.	341824	1.00	\$26.30	6/5/2019
Official Committee of Unsecured Creditors	2/25/2019	Meals (029)	Meals - VENDOR: GrubHub Holdings Inc. DBA Seamless Stephen Sell	341824	1.00	\$55.47	6/5/2019

Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured Creditors	1/29/2020	Meals (029)	Seamless Web Invoice #SL-7002-54 Ordered By / From: HouseKeep	352222	1.00	\$112.04	3/13/2020
Total meals						\$236.51	
Official Committee of Unsecured Creditors	8/28/2020	Messenger (004)	Vendor: Champion Courier, Inc.; Invoice#: 285519-ADJ; Date: 8/28/2020	540525	0.00	\$65.50	12/14/2020
Total messenger						\$65.50	
Official Committee of Unsecured Creditors	10/16/2020	Miscellaneous (099)	MERCHANT: COURTSOLUTIONS, Date: 10/16/2020	540575	0.00	\$70.00	12/14/2020
Official Committee of Unsecured Creditors	2/24/2021	Miscellaneous (099)	MERCHANT: COURTSOLUTIONS, Date: 2/24/2021	545916	0.00	\$70.00	4/30/2021
Total miscellaneous						\$140.00	
Official Committee of Unsecured Creditors	1/30/2019	Office Supplies (066)	Office Supplies - VENDOR: American Express	341824	1.00	-\$28.75	6/5/2019
Official Committee of Unsecured Creditors	5/3/2019	Office Supplies (066)	Office Supplies - VENDOR: American Express	342519	1.00	-\$28.75	6/21/2019
Official Committee of Unsecured Creditors	1/30/2019	Office Supplies (066)	Office Supplies - VENDOR: American Express	341824	1.00	-\$13.16	6/5/2019
Official Committee of Unsecured Creditors	2/10/2019	Office Supplies (066)	THE UPS STORE 1811 HUNTINGTON NY REF# 851329 OFF CE SUPPLY	341824	1.00	\$28.75	6/5/2019
Official Committee of Unsecured Creditors	5/3/2019	Office Supplies (066)	Office Supplies - VENDOR: American Express	342519	1.00	\$28.75	6/21/2019
Total office supplies						-\$13.16	
Official Committee of Unsecured Creditors	12/6/2019	Online research - West (075)	Reversal from Cancelled Voucher 256628	358158	1.00	-\$341.59	8/24/2020
Official Committee of Unsecured Creditors	12/3/2019	Online research - West (075)	Reversal from Cancelled Voucher 256628	358158	1.00	-\$53.79	8/24/2020
Official Committee of Unsecured Creditors	5/19/2020	Online research - West (075)	West Invoice #842421369 Usage Charges of: 5/1/2 0 Requested by:	358158	1.00	\$8.54	8/24/2020
Official Committee of Unsecured Creditors	1/15/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352221	1.00	\$15.09	3/13/2020
Official Committee of Unsecured Creditors	1/7/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352222	1.00	\$15.09	3/13/2020
Official Committee of Unsecured Creditors	11/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843	540575	1.00	\$16.23	12/14/2020
Official Committee of Unsecured Creditors	11/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843	540575	1.00	\$16.23	12/14/2020
Official Committee of Unsecured Creditors	1/1/2022	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 8456	559894	1.00	\$16.73	2/17/2022
Official Committee of Unsecured Creditors	11/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843	540525	1.00	\$19.02	12/14/2020
Official Committee of Unsecured Creditors	7/11/2019	Online research - West (075)	West Invoice #840762372 Usage Charges of: 8/1/1 9 Requested by:	346307	1.00	\$20.27	9/30/2019
Official Committee of Unsecured Creditors	1/1/2021	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 8436	542909	1.00	\$20.88	2/24/2021
Official Committee of Unsecured Creditors	1/1/2021	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 8436	542909	1.00	\$20.88	2/24/2021
Official Committee of Unsecured Creditors	7/7/2020	Online research - West (075)	West Invoice #842751040 Usage Charges of: 7/1/2 0 Requested by:	538311	1.00	\$21.06	10/22/2020
Official Committee of Unsecured Creditors	1/22/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352221	1.00	\$21.15	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352221	1.00	\$21.15	3/13/2020
Official Committee of Unsecured Creditors	1/31/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352221	1.00	\$21.15	3/13/2020
Official Committee of Unsecured Creditors	1/27/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352222	1.00	\$21.15	3/13/2020
Official Committee of Unsecured Creditors	6/3/2020	Online research - West (075)	West Invoice #842581127 Usage Charges of: 6/1/2 0 Requested by:	358158	1.00	\$21.77	8/24/2020
Official Committee of Unsecured Creditors	6/4/2020	Online research - West (075)	West Invoice #842581127 Usage Charges of: 6/1/2 0 Requested by:	358158	1.00	\$21.77	8/24/2020
Official Committee of Unsecured Creditors	5/13/2020	Online research - West (075)	West Invoice #842421369 Usage Charges of: 5/1/2 0 Requested by:	358158	1.00	\$22.60	8/24/2020
Official Committee of Unsecured Creditors	5/15/2020	Online research - West (075)	West Invoice #842421369 Usage Charges of: 5/1/2 0 Requested by:	358158	1.00	\$22.60	8/24/2020
Official Committee of Unsecured Creditors	5/18/2020	Online research - West (075)	West Invoice #842421369 Usage Charges of: 5/1/2 0 Requested by:	358158	1.00	\$22.60	8/24/2020
Official Committee of Unsecured Creditors	5/10/2020	Online research - West (075)	West Invoice #842421369 Usage Charges of: 5/1/2 0 Requested by:	358158	1.00	\$22.60	8/24/2020
Official Committee of Unsecured Creditors	5/20/2020	Online research - West (075)	West Invoice #842421369 Usage Charges of: 5/1/2 0 Requested by:	358158	1.00	\$22.60	8/24/2020
Official Committee of Unsecured Creditors	9/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 8429	538312	0.00	\$27.35	10/22/2020
Official Committee of Unsecured Creditors	9/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 8429	538312	0.00	\$27.35	10/22/2020
Official Committee of Unsecured Creditors	9/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 8429	538312	0.00	\$27.35	10/22/2020
Official Committee of Unsecured Creditors	9/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 8429	538312	0.00	\$27.35	10/22/2020
Official Committee of Unsecured Creditors	7/8/2019	Online research - West (075)	West Invoice #840762372 Usage Charges of: 8/1/1 9 Requested by:	346307	1.00	\$28.42	9/30/2019
Official Committee of Unsecured Creditors	10/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843	539160	1.00	\$28.43	11/12/2020
Official Committee of Unsecured Creditors	4/20/2020	Online research - West (075)	West Invoice #842383802 Usage Charges of: 4/1/2 0 Requested by:	356200	1.00	\$28.63	6/30/2020
Official Committee of Unsecured Creditors	4/21/2020	Online research - West (075)	West Invoice #842383802 Usage Charges of: 4/1/2 0 Requested by:	356200	1.00	\$28.63	6/30/2020
Official Committee of Unsecured Creditors	4/23/2020	Online research - West (075)	West Invoice #842383802 Usage Charges of: 4/1/2 0 Requested by:	356200	1.00	\$28.63	6/30/2020
Official Committee of Unsecured Creditors	4/6/2020	Online research - West (075)	West Invoice #842383802 Usage Charges of: 4/1/2 0 Requested by:	356200	1.00	\$28.63	6/30/2020
Official Committee of Unsecured Creditors	11/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843	540525	1.00	\$28.73	12/14/2020
Official Committee of Unsecured Creditors	9/1/2021	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 8449	553644	1.00	\$30.07	10/18/2021
Official Committee of Unsecured Creditors	10/8/2019	Online research - West (075)	West Invoice #841273818 Usage Charges of: 11/1/ 19 Requested by:	352221	1.00	\$30.12	3/13/2020
Official Committee of Unsecured Creditors	1/6/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352222	1.00	\$30.17	3/13/2020
Official Committee of Unsecured Creditors	7/1/2021	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 8446	550688	1.00	\$35.74	8/23/2021
Official Committee of Unsecured Creditors	8/5/2019	Online research - West (075)	West Invoice #840925271 Usage Charges of: 9/1/1 9 Requested by:	346307	1.00	\$36.95	9/30/2019
Official Committee of Unsecured Creditors	6/20/2020	Online research - West (075)	West Invoice #842581127 Usage Charges of: 6/1/2 0 Requested by:	358158	1.00	\$37.05	8/24/2020
Official Committee of Unsecured Creditors	6/9/2020	Online research - West (075)	West Invoice #842581127 Usage Charges of: 6/1/2 0 Requested by:	358158	1.00	\$40.34	8/24/2020
Official Committee of Unsecured Creditors	9/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 8429	538312	0.00	\$41.32	10/22/2020
Official Committee of Unsecured Creditors	7/16/2020	Online research - West (075)	West Invoice #842751040 Usage Charges of: 7/1/2 0 Requested by:	538312	1.00	\$42.12	10/22/2020
Official Committee of Unsecured Creditors	1/28/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352221	1.00	\$42.30	3/13/2020
Official Committee of Unsecured Creditors	4/22/2020	Online research - West (075)	West Invoice #842383802 Usage Charges of: 4/1/2 0 Requested by:	356200	1.00	\$43.25	6/30/2020
Official Committee of Unsecured Creditors	6/8/2020	Online research - West (075)	West Invoice #842581127 Usage Charges of: 6/1/2 0 Requested by:	358158	1.00	\$43.54	8/24/2020

Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured Creditors	1/6/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352222	1.00	\$253.52	3/13/2020
Official Committee of Unsecured Creditors	5/21/2020	Online research - West (075)	West Invoice #842421369 Usage Charges of: 5/1/2 0 Requested by:	358158	1.00	\$260.65	8/24/2020
Official Committee of Unsecured Creditors	1/21/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352221	1.00	\$264.31	3/13/2020
Official Committee of Unsecured Creditors	4/5/2020	Online research - West (075)	West Invoice #842383802 Usage Charges of: 4/1/2 0 Requested by:	356200	1.00	\$272.92	6/30/2020
Official Committee of Unsecured Creditors	10/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843	539161	1.00	\$284.27	11/12/2020
Official Committee of Unsecured Creditors	1/14/2020	Online research - West (075)	West Invoice #841806192 Usage Charges of: 2/1/2 0 Requested by:	352222	1.00	\$329.10	3/13/2020
Official Committee of Unsecured Creditors	12/6/2019	Online research - West (075)	West Invoice #841631882 Usage Charges of: 1/1/1 9 Requested by:	352222	1.00	\$341.59	3/13/2020
Official Committee of Unsecured Creditors	10/1/2020	Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843	539161	1.00	\$420.45	11/12/2020
Total online research						\$9,808.03	
Official Committee of Unsecured Creditors	5/3/2019	Out of town accomodations (070)	Out Of Town Accommodations - VENDOR: American Express	342519	1.00	-\$98.88	6/21/2019
Official Committee of Unsecured Creditors	2/15/2019	Out of town accomodations (070)	THE RITZ CARLTON WES WHITE PLAINS NY FOL# 127544 1 LODGING	341824	1.00	\$98.88	6/5/2019
Official Committee of Unsecured Creditors	5/3/2019	Out of town accomodations (070)	Out Of Town Accommodations - VENDOR: American Express	342519	1.00	\$98.88	6/21/2019
Official Committee of Unsecured Creditors	2/13/2019	Out of town accomodations (070)	HOTELS.COM1558737015 HOTELS.COM WA U87AKEAB0 155 73701	341824	1.00	\$453.24	6/5/2019
Total Out of town accomodations						\$552.12	
Official Committee of Unsecured Creditors	1/28/2019	Overtime (admin) (114)	Overtime (Admin) Overtime - Hernandez, Miguel	341824	1.00	\$189.00	6/5/2019
Total overtime						\$189.00	
Official Committee of Unsecured Creditors	10/7/2019	Pacer charges (074)	PACER Invoice #2560425-Q32019 Usage Period: Jul y 2019-Septemb	352221	1.00	\$3.30	3/13/2020
Official Committee of Unsecured Creditors	4/7/2021	Pacer charges (074)	Vendor: Pacer Service Center; Invoice#: 2560425-Q12021; Date: 4/7	546769	1.00	\$6.90	5/25/2021
Official Committee of Unsecured Creditors	4/7/2021	Pacer charges (074)	Vendor: Pacer Service Center; Invoice#: 2560425-Q12021; Date: 4/7	546768	1.00	\$7.10	5/25/2021
Official Committee of Unsecured Creditors	4/7/2022	Pacer charges (074)	Vendor: Pacer Service Center; Invoice#: 2560425-Q12022; Date: 4/7	565030	1.00	\$7.10	5/31/2022
Official Committee of Unsecured Creditors	10/10/2021	Pacer charges (074)	Vendor: Pacer Service Center; Invoice#: 2560425-Q32021; Date: 10/	554956	1.00	\$7.70	11/8/2021
Official Committee of Unsecured Creditors	7/8/2019	Pacer charges (074)	PACER Invoice #2560425-Q22019 Usage Period: Apr il 2019-June 20	346307	1.00	\$12.20	9/30/2019
Official Committee of Unsecured Creditors	1/7/2020	Pacer charges (074)	PACER Invoice #2560425-Q42019 Usage Period: Oct ober 2019-Dece	352222	1.00	\$12.90	3/13/2020
Official Committee of Unsecured Creditors	7/8/2021	Pacer charges (074)	Vendor: Pacer Service Center; Invoice#: 2560425-Q22021; Date: 7/8	550688	1.00	\$13.80	8/23/2021
Official Committee of Unsecured Creditors	1/7/2020	Pacer charges (074)	PACER Invoice #2560425-Q42019 Usage Period: Oct ober 2019-Dece	352221	1.00	\$14.90	3/13/2020
Official Committee of Unsecured Creditors	1/6/2022	Pacer charges (074)	Vendor: Pacer Service Center; Invoice#: 2560425-Q42021; Date: 1/6	559894	1.00	\$28.10	2/17/2022
Official Committee of Unsecured Creditors	10/7/2020	Pacer charges (074)	Vendor: Pacer Service Center; Invoice#: 2560425-Q32020; Date: 10/	540575	0.00	\$36.30	12/14/2020
Official Committee of Unsecured Creditors	4/8/2019	Pacer charges (074)	PACER Invoice #2560425-Q12019 Usage Period: Jan uary 2019-Marc	342519	1.00	\$40.10	6/21/2019
Official Committee of Unsecured Creditors	10/7/2020	Pacer charges (074)	Vendor: Pacer Service Center; Invoice#: 2560425-Q32020; Date: 10/	540525	0.00	\$40.90	12/14/2020
Official Committee of Unsecured Creditors	1/6/2021	Pacer charges (074)	Vendor: Pacer Service Center; Invoice#: 2560425-Q42020; Date: 1/6	542957	1.00	\$44.20	2/24/2021
Official Committee of Unsecured Creditors	7/7/2020	Pacer charges (074)	PACER Invoice #2560425-Q22020 Usage Period: Apr il 2020 - June 2	358157	1.00	\$51.40	8/24/2020
Official Committee of Unsecured Creditors	1/6/2021	Pacer charges (074)	Vendor: Pacer Service Center; Invoice#: 2560425-Q42020; Date: 1/6	542909	1.00	\$80.00	2/24/2021
Official Committee of Unsecured Creditors	4/6/2020	Pacer charges (074)	PACER Invoice #2560425-Q12020 Usage Period: Jan uary 2020 - Mar	355261	1.00	\$86.20	5/29/2020
Official Committee of Unsecured Creditors	7/7/2020	Pacer charges (074)	PACER Invoice #2560425-Q22020 Usage Period: Apr il 2020 - June 2	358158	1.00	\$129.10	8/24/2020
Official Committee of Unsecured Creditors	4/6/2020	Pacer charges (074)	PACER Invoice #2560425-Q12020 Usage Period: Jan uary 2020 - Mar	356200	1.00	\$179.20	6/30/2020
Total pacer charges						\$801.40	
Official Committee of Unsecured Creditors	2/27/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Larisa Poretsky On Unit N	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	2/27/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Larisa Poretsky On Unit N	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	2/27/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Larisa Poretsky On Unit N	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	1/27/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Linda Schepp On Unit Nun	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	2/27/2020	Photocopies (003)	Photocopies - Inside Inside copy made by Larisa Poretsky On Unit N	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	11/20/2019	Photocopies (003)	Photocopies - Inside Inside copy made by Pitney Bowes On Unit Nur	352222	54.00	\$9.72	3/13/2020
Total photocopies						\$14.58	

Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured Creditors	1/15/2019	Postage (001)	Postage	341824	1.00	\$11.04	6/5/2019
Official Committee of Unsecured Creditors	2/12/2019	Printing - blowback (089)	Printing - Blowback	341824	38.00	\$6.84	6/5/2019
Official Committee of Unsecured Creditors	4/24/2019	Printing - blowback (089)	Printing - Blowback	342519	79.00	\$14.22	6/21/2019
Official Committee of Unsecured Creditors	7/29/2020	Printing - blowback (089)	Printing - Blowback	358158	83.00	\$14.94	8/24/2020
Official Committee of Unsecured Creditors	2/8/2019	Printing - blowback (089)	Printing - Blowback	341824	118.00	\$21.24	6/5/2019
Official Committee of Unsecured Creditors	1/15/2019	Printing - blowback (089)	Printing - Blowback	341824	144.00	\$25.92	6/5/2019
Official Committee of Unsecured Creditors	2/10/2020	Printing - blowback (089)	Printing - Blowback	352221	160.00	\$28.80	3/13/2020
Official Committee of Unsecured Creditors	11/7/2019	Printing - blowback (089)	Printing - Blowback	352221	240.00	\$43.20	3/13/2020
Official Committee of Unsecured Creditors	1/14/2020	Printing - blowback (089)	Printing - Blowback	352222	244.00	\$43.92	3/13/2020
Official Committee of Unsecured Creditors	3/11/2020	Printing - blowback (089)	Printing - Blowback	354103	245.00	\$44.10	4/20/2020
Official Committee of Unsecured Creditors	3/11/2020	Printing - blowback (089)	Printing - Blowback	354103	245.00	\$44.10	4/20/2020
Official Committee of Unsecured Creditors	11/19/2019	Printing - blowback (089)	Printing - Blowback	352222	256.00	\$46.08	3/13/2020
Official Committee of Unsecured Creditors	11/20/2019	Printing - blowback (089)	Printing - Blowback	352222	260.00	\$46.80	3/13/2020
Official Committee of Unsecured Creditors	1/11/2019	Printing - blowback (089)	Printing - Blowback	341824	261.00	\$46.98	6/5/2019
Official Committee of Unsecured Creditors	1/11/2019	Printing - blowback (089)	Printing - Blowback	341824	265.00	\$47.70	6/5/2019
Official Committee of Unsecured Creditors	2/25/2020	Printing - blowback (089)	Printing - Blowback	352222	271.00	\$48.78	3/13/2020
Official Committee of Unsecured Creditors	12/18/2019	Printing - blowback (089)	Printing - Blowback	352222	279.00	\$50.22	3/13/2020
Official Committee of Unsecured Creditors	1/30/2020	Printing - blowback (089)	Printing - Blowback	352222	279.00	\$50.22	3/13/2020
Official Committee of Unsecured Creditors	2/12/2019	Printing - blowback (089)	Printing - Blowback	341824	307.00	\$55.26	6/5/2019
Official Committee of Unsecured Creditors	5/23/2021	Printing - blowback (089)	Printing - Blowback	547628	320.00	\$57.60	6/16/2021
Official Committee of Unsecured Creditors	2/24/2020	Printing - blowback (089)	Printing - Blowback	352222	386.00	\$69.48	3/13/2020
Official Committee of Unsecured Creditors	2/12/2019	Printing - blowback (089)	Printing - Blowback	341824	402.00	\$72.36	6/5/2019
Official Committee of Unsecured Creditors	1/21/2020	Printing - blowback (089)	Printing - Blowback	352222	446.00	\$80.28	3/13/2020
Official Committee of Unsecured Creditors	8/25/2020	Printing - blowback (089)	Printing - Blowback	538312	454.00	\$81.72	10/22/2020
Official Committee of Unsecured Creditors	1/9/2020	Printing - blowback (089)	Printing - Blowback	352221	524.00	\$94.32	3/13/2020
Official Committee of Unsecured Creditors	2/27/2019	Printing - blowback (089)	Printing - Blowback	341824	565.00	\$101.70	6/5/2019
Official Committee of Unsecured Creditors	4/2/2020	Printing - blowback (089)	Printing - Blowback	356647	600.00	\$108.00	7/16/2020
Official Committee of Unsecured Creditors	11/5/2019	Printing - blowback (089)	Printing - Blowback	352221	633.00	\$113.94	3/13/2020
Official Committee of Unsecured Creditors	8/24/2020	Printing - blowback (089)	Printing - Blowback	538312	701.00	\$126.18	10/22/2020
Official Committee of Unsecured Creditors	2/12/2019	Printing - blowback (089)	Printing - Blowback	341824	756.00	\$136.08	6/5/2019
Official Committee of Unsecured Creditors	1/21/2020	Printing - blowback (089)	Printing - Blowback	352222	962.00	\$173.16	3/13/2020
Official Committee of Unsecured Creditors	7/8/2021	Printing - blowback (089)	Printing - Blowback	550688	1,048.00	\$188.64	8/23/2021
Official Committee of Unsecured Creditors	1/23/2020	Printing - blowback (089)	Printing - Blowback	352222	1,408.00	\$253.44	3/13/2020
Official Committee of Unsecured Creditors	6/2/2020	Printing - blowback (089)	Printing - Blowback	356648	1,424.00	\$256.32	7/16/2020
Official Committee of Unsecured Creditors	1/22/2020	Printing - blowback (089)	Printing - Blowback	352222	1,460.00	\$262.80	3/13/2020
Official Committee of Unsecured Creditors	6/5/2020	Printing - blowback (089)	Printing - Blowback	356648	1,476.00	\$265.68	7/16/2020
Official Committee of Unsecured Creditors	9/11/2020	Printing - blowback (089)	Printing - Blowback	538311	1,908.00	\$343.44	10/22/2020
Official Committee of Unsecured Creditors	12/4/2019	Printing - blowback (089)	Printing - Blowback	352222	3,102.00	\$558.36	3/13/2020
Official Committee of Unsecured Creditors	8/5/2020	Printing - blowback (089)	Printing - Blowback	538312	11,532.00	\$2,075.76	10/22/2020
Total printing blowback						\$6,109.62	
Official Committee of Unsecured Creditors	1/14/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	1/16/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	2/11/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	2/11/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	2/11/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	2/19/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	2/21/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	3/18/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	3/18/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	3/26/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	3/26/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	3/27/2019	Printing (080)	Printing	341824	1.00	\$0.18	6/5/2019
Official Committee of Unsecured Creditors	4/30/2019	Printing (080)	Printing	342519	1.00	\$0.18	6/21/2019
Official Committee of Unsecured Creditors	5/1/2019	Printing (080)	Printing	342519	1.00	\$0.18	6/21/2019
Official Committee of Unsecured Creditors	6/18/2019	Printing (080)	Printing	346307	1.00	\$0.18	9/30/2019
Official Committee of Unsecured Creditors	6/18/2019	Printing (080)	Printing	346307	1.00	\$0.18	9/30/2019
Official Committee of Unsecured Creditors	6/18/2019	Printing (080)	Printing	346307	1.00	\$0.18	9/30/2019
Official Committee of Unsecured Creditors	6/18/2019	Printing (080)	Printing	346307	1.00	\$0.18	9/30/2019
Official Committee of Unsecured Creditors	6/18/2019	Printing (080)	Printing	346307	1.00	\$0.18	9/30/2019
Official Committee of Unsecured Creditors	6/18/2019	Printing (080)	Printing	346307	1.00	\$0.18	9/30/2019
Official Committee of Unsecured Creditors	7/31/2019	Printing (080)	Printing	346307	1.00	\$0.18	9/30/2019
Official Committee of Unsecured Creditors	8/27/2019	Printing (080)	Printing	346307	1.00	\$0.18	9/30/2019

Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured Creditors	8/27/2019	Printing (080)	Printing	346307	1.00	\$0.18	9/30/2019
Official Committee of Unsecured Creditors	11/12/2019	Printing (080)	Printing	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	11/25/2019	Printing (080)	Printing	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	11/25/2019	Printing (080)	Printing	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	2/4/2020	Printing (080)	Printing	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	1.00	\$0.18	3/13/2020
Official Committee of Unsecured Creditors	3/2/2020	Printing (080)	Printing	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	3/4/2020	Printing (080)	Printing	354103	1.00	\$0.18	4/20/2020
Official Committee of Unsecured Creditors	12/3/2021	Printing (080)		559069	1.00	\$0.18	1/31/2022
Official Committee of Unsecured Creditors	1/15/2019	Printing (080)	Printing	341824	2.00	\$0.36	6/5/2019
Official Committee of Unsecured Creditors	2/8/2019	Printing (080)	Printing	341824	2.00	\$0.36	6/5/2019
Official Committee of Unsecured Creditors	2/11/2019	Printing (080)	Printing	341824	2.00	\$0.36	6/5/2019
Official Committee of Unsecured Creditors	2/11/2019	Printing (080)	Printing	341824	2.00	\$0.36	6/5/2019
Official Committee of Unsecured Creditors	2/11/2019	Printing (080)	Printing	341824	2.00	\$0.36	6/5/2019
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	2.00	\$0.36	6/5/2019
Official Committee of Unsecured Creditors	2/25/2019	Printing (080)	Printing	341824	2.00	\$0.36	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	Printing (080)	Printing	341824	2.00	\$0.36	6/5/2019
Official Committee of Unsecured Creditors	3/18/2019	Printing (080)	Printing	341824	2.00	\$0.36	6/5/2019
Official Committee of Unsecured Creditors	6/19/2019	Printing (080)	Printing	346307	2.00	\$0.36	9/30/2019
Official Committee of Unsecured Creditors	1/28/2020	Printing (080)	Printing	352221	2.00	\$0.36	3/13/2020
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	2.00	\$0.36	3/13/2020
Official Committee of Unsecured Creditors	2/27/2020	Printing (080)	Printing	352222	2.00	\$0.36	3/13/2020
Official Committee of Unsecured Creditors	3/3/2020	Printing (080)	Printing	354103	2.00	\$0.36	4/20/2020
Official Committee of Unsecured Creditors	3/3/2020	Printing (080)	Printing	354103	2.00	\$0.36	4/20/2020
Official Committee of Unsecured Creditors	1/16/2019	Printing (080)	Printing	341824	3.00	\$0.54	6/5/2019
Official Committee of Unsecured Creditors	1/17/2019	Printing (080)	Printing	341824	3.00	\$0.54	6/5/2019
Official Committee of Unsecured Creditors	1/28/2019	Printing (080)	Printing	341824	3.00	\$0.54	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	Printing (080)	Printing	341824	3.00	\$0.54	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	Printing (080)	Printing	341824	3.00	\$0.54	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	Printing (080)	Printing	341824	3.00	\$0.54	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	Printing (080)	Printing	341824	3.00	\$0.54	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	Printing (080)	Printing	341824	3.00	\$0.54	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	Printing (080)	Printing	341824	3.00	\$0.54	6/5/2019
Official Committee of Unsecured Creditors	2/28/2019	Printing (080)	Printing	341824	3.00	\$0.54	6/5/2019
Official Committee of Unsecured Creditors	7/31/2019	Printing (080)	Printing	346307	3.00	\$0.54	9/30/2019
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	3.00	\$0.54	3/13/2020
Official Committee of Unsecured Creditors	3/4/2020	Printing (080)	Printing	354102	3.00	\$0.54	4/20/2020
Official Committee of Unsecured Creditors	1/12/2019	Printing (080)	Printing	341824	4.00	\$0.72	6/5/2019
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	4.00	\$0.72	6/5/2019
Official Committee of Unsecured Creditors	3/15/2019	Printing (080)	Printing	341824	4.00	\$0.72	6/5/2019
Official Committee of Unsecured Creditors	6/11/2019	Printing (080)	Printing	346307	4.00	\$0.72	9/30/2019
Official Committee of Unsecured Creditors	9/12/2019	Printing (080)	Printing	348033	4.00	\$0.72	11/18/2019
Official Committee of Unsecured Creditors	2/4/2020	Printing (080)	Printing	352221	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	2/21/2020	Printing (080)	Printing	352222	4.00	\$0.72	3/13/2020
Official Committee of Unsecured Creditors	12/3/2021	Printing (080)		559069	4.00	\$0.72	1/31/2022
Official Committee of Unsecured Creditors	11/12/2019	Printing (080)	Printing	352221	5.00	\$0.90	3/13/2020
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	6.00	\$1.08	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	Printing (080)	Printing	341824	6.00	\$1.08	6/5/2019
Official Committee of Unsecured Creditors	5/17/2019	Printing (080)	Printing	342519	6.00	\$1.08	6/21/2019
Official Committee of Unsecured Creditors	5/20/2019	Printing (080)	Printing	342519	6.00	\$1.08	6/21/2019
Official Committee of Unsecured Creditors	7/12/2019	Printing (080)	Printing	346307	6.00	\$1.08	9/30/2019
Official Committee of Unsecured Creditors	7/12/2019	Printing (080)	Printing	346307	6.00	\$1.08	9/30/2019
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	7.00	\$1.26	3/13/2020
Official Committee of Unsecured Creditors	2/21/2020	Printing (080)	Printing	352222	7.00	\$1.26	3/13/2020
Official Committee of Unsecured Creditors	2/27/2020	Printing (080)	Printing	352222	7.00	\$1.26	3/13/2020
Official Committee of Unsecured Creditors	3/3/2020	Printing (080)	Printing	354103	7.00	\$1.26	4/20/2020
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	8.00	\$1.44	6/5/2019
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	8.00	\$1.44	6/5/2019
Official Committee of Unsecured Creditors	4/9/2019	Printing (080)	Printing	342519	8.00	\$1.44	6/21/2019
Official Committee of Unsecured Creditors	3/2/2020	Printing (080)	Printing	354102	8.00	\$1.44	4/20/2020
Official Committee of Unsecured Creditors	3/2/2020	Printing (080)	Printing	354103	8.00	\$1.44	4/20/2020
Official Committee of Unsecured Creditors	2/11/2019	Printing (080)	Printing	341824	9.00	\$1.62	6/5/2019

Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured Creditors	10/7/2019	Printing (080)	Printing	348033	15.00	\$2.70	11/18/2019
Official Committee of Unsecured Creditors	1/29/2020	Printing (080)	Printing	352221	15.00	\$2.70	3/13/2020
Official Committee of Unsecured Creditors	1/29/2020	Printing (080)	Printing	352221	15.00	\$2.70	3/13/2020
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	15.00	\$2.70	3/13/2020
Official Committee of Unsecured Creditors	12/16/2019	Printing (080)	Printing	352222	15.00	\$2.70	3/13/2020
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352222	15.00	\$2.70	3/13/2020
Official Committee of Unsecured Creditors	1/11/2019	Printing (080)	Printing	341824	16.00	\$2.88	6/5/2019
Official Committee of Unsecured Creditors	1/15/2019	Printing (080)	Printing	341824	16.00	\$2.88	6/5/2019
Official Committee of Unsecured Creditors	8/28/2019	Printing (080)	Printing	346307	16.00	\$2.88	9/30/2019
Official Committee of Unsecured Creditors	10/7/2019	Printing (080)	Printing	348033	16.00	\$2.88	11/18/2019
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	16.00	\$2.88	3/13/2020
Official Committee of Unsecured Creditors	2/20/2020	Printing (080)	Printing	352221	16.00	\$2.88	3/13/2020
Official Committee of Unsecured Creditors	2/5/2020	Printing (080)	Printing	352222	16.00	\$2.88	3/13/2020
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352222	16.00	\$2.88	3/13/2020
Official Committee of Unsecured Creditors	4/24/2020	Printing (080)	Printing	355208	16.00	\$2.88	5/28/2020
Official Committee of Unsecured Creditors	2/11/2019	Printing (080)	Printing	341824	17.00	\$3.06	6/5/2019
Official Committee of Unsecured Creditors	11/20/2019	Printing (080)	Printing	352221	17.00	\$3.06	3/13/2020
Official Committee of Unsecured Creditors	11/21/2019	Printing (080)	Printing	352221	17.00	\$3.06	3/13/2020
Official Committee of Unsecured Creditors	11/25/2019	Printing (080)	Printing	352221	17.00	\$3.06	3/13/2020
Official Committee of Unsecured Creditors	12/27/2019	Printing (080)	Printing	352222	17.00	\$3.06	3/13/2020
Official Committee of Unsecured Creditors	2/6/2019	Printing (080)	Printing	341824	18.00	\$3.24	6/5/2019
Official Committee of Unsecured Creditors	2/7/2019	Printing (080)	Printing	341824	18.00	\$3.24	6/5/2019
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	18.00	\$3.24	6/5/2019
Official Committee of Unsecured Creditors	10/7/2019	Printing (080)	Printing	348033	18.00	\$3.24	11/18/2019
Official Committee of Unsecured Creditors	12/16/2019	Printing (080)	Printing	352222	18.00	\$3.24	3/13/2020
Official Committee of Unsecured Creditors	1/11/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	1/16/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	2/4/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	2/20/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	3/6/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	3/14/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	3/14/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	3/18/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	3/25/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	3/26/2019	Printing (080)	Printing	341824	19.00	\$3.42	6/5/2019
Official Committee of Unsecured Creditors	1/27/2020	Printing (080)	Printing	352221	19.00	\$3.42	3/13/2020
Official Committee of Unsecured Creditors	1/11/2019	Printing (080)	Printing	341824	20.00	\$3.60	6/5/2019
Official Committee of Unsecured Creditors	1/11/2019	Printing (080)	Printing	341824	20.00	\$3.60	6/5/2019
Official Committee of Unsecured Creditors	1/16/2019	Printing (080)	Printing	341824	20.00	\$3.60	6/5/2019
Official Committee of Unsecured Creditors	10/7/2019	Printing (080)	Printing	348033	20.00	\$3.60	11/18/2019
Official Committee of Unsecured Creditors	1/24/2020	Printing (080)	Printing	352221	20.00	\$3.60	3/13/2020
Official Committee of Unsecured Creditors	1/23/2020	Printing (080)	Printing	352221	21.00	\$3.78	3/13/2020
Official Committee of Unsecured Creditors	3/22/2019	Printing (080)	Printing	341824	22.00	\$3.96	6/5/2019
Official Committee of Unsecured Creditors	6/11/2019	Printing (080)	Printing	346307	22.00	\$3.96	9/30/2019
Official Committee of Unsecured Creditors	1/24/2020	Printing (080)	Printing	352221	22.00	\$3.96	3/13/2020
Official Committee of Unsecured Creditors	1/24/2020	Printing (080)	Printing	352221	22.00	\$3.96	3/13/2020
Official Committee of Unsecured Creditors	3/4/2020	Printing (080)	Printing	354103	22.00	\$3.96	4/20/2020
Official Committee of Unsecured Creditors	10/2/2019	Printing (080)	Printing	348033	23.00	\$4.14	11/18/2019
Official Committee of Unsecured Creditors	2/28/2020	Printing (080)	Printing	352222	23.00	\$4.14	3/13/2020
Official Committee of Unsecured Creditors	1/11/2019	Printing (080)	Printing	341824	24.00	\$4.32	6/5/2019
Official Committee of Unsecured Creditors	1/11/2019	Printing (080)	Printing	341824	24.00	\$4.32	6/5/2019
Official Committee of Unsecured Creditors	10/7/2019	Printing (080)	Printing	348033	24.00	\$4.32	11/18/2019
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	24.00	\$4.32	3/13/2020
Official Committee of Unsecured Creditors	2/11/2020	Printing (080)	Printing	352221	24.00	\$4.32	3/13/2020
Official Committee of Unsecured Creditors	2/21/2020	Printing (080)	Printing	352222	24.00	\$4.32	3/13/2020
Official Committee of Unsecured Creditors	5/13/2019	Printing (080)	Printing	342519	25.00	\$4.50	6/21/2019
Official Committee of Unsecured Creditors	1/11/2019	Printing (080)	Printing	341824	26.00	\$4.68	6/5/2019
Official Committee of Unsecured Creditors	2/5/2020	Printing (080)	Printing	352221	26.00	\$4.68	3/13/2020
Official Committee of Unsecured Creditors	2/5/2020	Printing (080)	Printing	352221	26.00	\$4.68	3/13/2020
Official Committee of Unsecured Creditors	2/5/2020	Printing (080)	Printing	352221	26.00	\$4.68	3/13/2020
Official Committee of Unsecured Creditors	1/11/2019	Printing (080)	Printing	341824	27.00	\$4.86	6/5/2019
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	27.00	\$4.86	6/5/2019
Official Committee of Unsecured Creditors	10/7/2019	Printing (080)	Printing	348033	27.00	\$4.86	11/18/2019

Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured Creditors	3/2/2020	Printing (080)	Printing	354103	27.00	\$4.86	4/20/2020
Official Committee of Unsecured Creditors	1/11/2019	Printing (080)	Printing	341824	28.00	\$5.04	6/5/2019
Official Committee of Unsecured Creditors	10/7/2019	Printing (080)	Printing	348033	28.00	\$5.04	11/18/2019
Official Committee of Unsecured Creditors	1/31/2020	Printing (080)	Printing	352221	28.00	\$5.04	3/13/2020
Official Committee of Unsecured Creditors	12/2/2019	Printing (080)	Printing	352222	28.00	\$5.04	3/13/2020
Official Committee of Unsecured Creditors	6/17/2019	Printing (080)	Printing	346307	30.00	\$5.40	9/30/2019
Official Committee of Unsecured Creditors	7/12/2019	Printing (080)	Printing	346307	30.00	\$5.40	9/30/2019
Official Committee of Unsecured Creditors	1/29/2020	Printing (080)	Printing	352221	30.00	\$5.40	3/13/2020
Official Committee of Unsecured Creditors	1/29/2019	Printing (080)	Printing	341824	31.00	\$5.58	6/5/2019
Official Committee of Unsecured Creditors	5/1/2019	Printing (080)	Printing	342519	31.00	\$5.58	6/21/2019
Official Committee of Unsecured Creditors	5/4/2019	Printing (080)	Printing	342519	31.00	\$5.58	6/21/2019
Official Committee of Unsecured Creditors	5/13/2019	Printing (080)	Printing	342519	31.00	\$5.58	6/21/2019
Official Committee of Unsecured Creditors	2/5/2020	Printing (080)	Printing	352221	31.00	\$5.58	3/13/2020
Official Committee of Unsecured Creditors	3/2/2020	Printing (080)	Printing	354103	31.00	\$5.58	4/20/2020
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	32.00	\$5.76	6/5/2019
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	32.00	\$5.76	6/5/2019
Official Committee of Unsecured Creditors	10/7/2019	Printing (080)	Printing	348033	33.00	\$5.94	11/18/2019
Official Committee of Unsecured Creditors	2/18/2020	Printing (080)	Printing	352221	33.00	\$5.94	3/13/2020
Official Committee of Unsecured Creditors	12/3/2021	Printing (080)	Printing	559069	33.00	\$5.94	1/31/2022
Official Committee of Unsecured Creditors	6/18/2019	Printing (080)	Printing	346307	34.00	\$6.12	9/30/2019
Official Committee of Unsecured Creditors	11/12/2019	Printing (080)	Printing	352221	34.00	\$6.12	3/13/2020
Official Committee of Unsecured Creditors	2/13/2020	Printing (080)	Printing	352221	35.00	\$6.30	3/13/2020
Official Committee of Unsecured Creditors	1/14/2020	Printing (080)	Printing	352222	35.00	\$6.30	3/13/2020
Official Committee of Unsecured Creditors	12/12/2019	Printing (080)	Printing	352222	36.00	\$6.48	3/13/2020
Official Committee of Unsecured Creditors	12/18/2019	Printing (080)	Printing	352222	36.00	\$6.48	3/13/2020
Official Committee of Unsecured Creditors	1/22/2020	Printing (080)	Printing	352221	39.00	\$7.02	3/13/2020
Official Committee of Unsecured Creditors	1/11/2019	Printing (080)	Printing	341824	40.00	\$7.20	6/5/2019
Official Committee of Unsecured Creditors	2/13/2019	Printing (080)	Printing	341824	40.00	\$7.20	6/5/2019
Official Committee of Unsecured Creditors	2/21/2019	Printing (080)	Printing	341824	40.00	\$7.20	6/5/2019
Official Committee of Unsecured Creditors	2/26/2019	Printing (080)	Printing	341824	40.00	\$7.20	6/5/2019
Official Committee of Unsecured Creditors	10/7/2019	Printing (080)	Printing	348033	40.00	\$7.20	11/18/2019
Official Committee of Unsecured Creditors	1/27/2020	Printing (080)	Printing	352221	42.00	\$7.56	3/13/2020
Official Committee of Unsecured Creditors	3/6/2019	Printing (080)	Printing	341824	45.00	\$8.10	6/5/2019
Official Committee of Unsecured Creditors	3/8/2019	Printing (080)	Printing	341824	45.00	\$8.10	6/5/2019
Official Committee of Unsecured Creditors	3/8/2019	Printing (080)	Printing	341824	45.00	\$8.10	6/5/2019
Official Committee of Unsecured Creditors	3/28/2019	Printing (080)	Printing	341824	47.00	\$8.46	6/5/2019
Official Committee of Unsecured Creditors	1/21/2020	Printing (080)	Printing	352222	52.00	\$9.36	3/13/2020
Official Committee of Unsecured Creditors	1/13/2020	Printing (080)	Printing	352222	56.00	\$10.08	3/13/2020
Official Committee of Unsecured Creditors	1/16/2020	Printing (080)	Printing	352222	56.00	\$10.08	3/13/2020
Official Committee of Unsecured Creditors	4/24/2019	Printing (080)	Printing	342519	57.00	\$10.26	6/21/2019
Official Committee of Unsecured Creditors	1/30/2020	Printing (080)	Printing	352221	59.00	\$10.62	3/13/2020
Official Committee of Unsecured Creditors	12/3/2019	Printing (080)	Printing	352222	60.00	\$10.80	3/13/2020
Official Committee of Unsecured Creditors	3/2/2020	Printing (080)	Printing	354103	62.00	\$11.16	4/20/2020
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	75.00	\$13.50	3/13/2020
Official Committee of Unsecured Creditors	2/10/2020	Printing (080)	Printing	352221	78.00	\$14.04	3/13/2020
Official Committee of Unsecured Creditors	1/21/2020	Printing (080)	Printing	352222	78.00	\$14.04	3/13/2020
Official Committee of Unsecured Creditors	12/10/2019	Printing (080)	Printing	352222	85.00	\$15.30	3/13/2020
Official Committee of Unsecured Creditors	2/21/2020	Printing (080)	Printing	352222	86.00	\$15.48	3/13/2020
Official Committee of Unsecured Creditors	2/21/2020	Printing (080)	Printing	352222	86.00	\$15.48	3/13/2020
Official Committee of Unsecured Creditors	12/27/2019	Printing (080)	Printing	352222	154.00	\$27.72	3/13/2020
Official Committee of Unsecured Creditors	11/21/2019	Printing (080)	Printing	352221	171.00	\$30.78	3/13/2020
Official Committee of Unsecured Creditors	2/13/2020	Printing (080)	Printing	352221	238.00	\$42.84	3/13/2020
Official Committee of Unsecured Creditors	1/14/2020	Printing (080)	Printing	352222	244.00	\$43.92	3/13/2020
Official Committee of Unsecured Creditors	12/3/2019	Printing (080)	Printing	352222	279.00	\$50.22	3/13/2020
Total printing						\$994.68	
Official Committee of Unsecured Creditors	7/1/2020	Process Servers (023)	Process server.	538311	0.00	\$50.00	10/22/2020
Official Committee of Unsecured Creditors	12/31/2019	Process Servers (023)	Process server	352222	1.00	\$232.49	3/13/2020
Official Committee of Unsecured Creditors	12/31/2019	Process Servers (023)	Process server	352222	1.00	\$234.61	3/13/2020
Official Committee of Unsecured Creditors	1/31/2020	Process Servers (023)	Process server	352222	1.00	\$276.70	3/13/2020
Official Committee of Unsecured Creditors	1/31/2020	Process Servers (023)	Process server	352222	1.00	\$291.24	3/13/2020
Official Committee of Unsecured Creditors	1/31/2020	Process Servers (023)	Process server	352222	1.00	\$338.19	3/13/2020
Official Committee of Unsecured Creditors	12/31/2019	Process Servers (023)	Process server	352222	1.00	\$376.24	3/13/2020
Official Committee of Unsecured Creditors	12/31/2019	Process Servers (023)	Process server	352222	1.00	\$376.48	3/13/2020

Client/Matter	Transaction Date	Disb Code	Narrative	Bill Number	Billed Quantity	Billed Amount	Bill Date
Official Committee of Unsecured Creditors	12/31/2019	Process Servers (023)	Process server	352222	1.00	\$376.71	3/13/2020
Official Committee of Unsecured Creditors	12/31/2019	Process Servers (023)	Process server	352222	1.00	\$387.04	3/13/2020
Official Committee of Unsecured Creditors	12/31/2019	Process Servers (023)	Process server	352222	1.00	\$435.62	3/13/2020
Total process servers						\$3,375.32	
Official Committee of Unsecured Creditors	2/11/2019	Shipping (013)	Invoice No: 646428648 Paid to: Fedex per Larisa Poretsky Ship To: H	341824	1.00	\$18.15	6/5/2019
Official Committee of Unsecured Creditors	9/21/2020	Shipping (013)	Vendor: Federal Express; Invoice#: 712874972; Date: 9/21/2020	538311	0.00	\$21.06	10/22/2020
Official Committee of Unsecured Creditors	9/21/2020	Shipping (013)	Vendor: Federal Express; Invoice#: 712874972; Date: 9/21/2020	538311	0.00	\$21.06	10/22/2020
Official Committee of Unsecured Creditors	9/21/2020	Shipping (013)	Vendor: Federal Express; Invoice#: 712874972; Date: 9/21/2020	538311	0.00	\$21.06	10/22/2020
Official Committee of Unsecured Creditors	7/19/2021	Shipping (013)	Vendor: Federal Express; Invoice#: 743908263; Date: 7/19/2021	550688	0.00	\$21.24	8/23/2021
Official Committee of Unsecured Creditors	7/19/2021	Shipping (013)	Vendor: Federal Express; Invoice#: 743908263; Date: 7/19/2021	550688	0.00	\$21.24	8/23/2021
Official Committee of Unsecured Creditors	7/19/2021	Shipping (013)	Vendor: Federal Express; Invoice#: 743908263; Date: 7/19/2021	550688	0.00	\$21.24	8/23/2021
Official Committee of Unsecured Creditors	6/2/2020	Shipping (013)	Invoice No: 703213622 Paid to: Fedex per Heather Zimmer Ship To:	358158	1.00	\$21.76	8/24/2020
Official Committee of Unsecured Creditors	6/2/2020	Shipping (013)	Invoice No: 703213622 Paid to: Fedex per Heather Zimmer Ship To:	358158	1.00	\$21.76	8/24/2020
Official Committee of Unsecured Creditors	9/7/2020	Shipping (013)	Vendor: Federal Express; Invoice#: 711475989; Date: 9/7/2020	538311	0.00	\$23.60	10/22/2020
Official Committee of Unsecured Creditors	9/7/2020	Shipping (013)	Vendor: Federal Express; Invoice#: 711475989; Date: 9/7/2020	538311	0.00	\$23.60	10/22/2020
Official Committee of Unsecured Creditors	9/7/2020	Shipping (013)	Vendor: Federal Express; Invoice#: 711475989; Date: 9/7/2020	538311	0.00	\$23.60	10/22/2020
Official Committee of Unsecured Creditors	5/12/2020	Shipping (013)	Invoice No: 701323931 Paid to: Fedex per Linda Schepp Ship To: Lin	358157	1.00	\$23.92	8/24/2020
Official Committee of Unsecured Creditors	8/5/2020	Shipping (013)	Invoice No: 708923794 Paid to: Fedex per Linda Schepp Ship To: He	538312	1.00	\$30.95	10/22/2020
Official Committee of Unsecured Creditors	8/5/2020	Shipping (013)	Invoice No: 708923794 Paid to: Fedex per Linda Schepp Ship To: Jas	538312	1.00	\$30.95	10/22/2020
Official Committee of Unsecured Creditors	8/5/2020	Shipping (013)	Invoice No: 708923794 Paid to: Fedex per Linda Schepp Ship To: Sea	538312	1.00	\$31.92	10/22/2020
Official Committee of Unsecured Creditors	8/5/2020	Shipping (013)	Invoice No: 708923794 Paid to: Fedex per Linda Schepp Ship To: Chr	538312	1.00	\$31.92	10/22/2020
Official Committee of Unsecured Creditors	8/5/2020	Shipping (013)	Invoice No: 708923794 Paid to: Fedex per Linda Schepp Ship To: Liz	538312	1.00	\$31.92	10/22/2020
Official Committee of Unsecured Creditors	12/21/2020	Shipping (013)	Vendor: Federal Express; Invoice#: 722022220; Date: 12/21/2020	541327	0.00	\$35.32	1/19/2021
Official Committee of Unsecured Creditors	12/21/2020	Shipping (013)	Vendor: Federal Express; Invoice#: 722022220; Date: 12/21/2020	541327	0.00	\$35.32	1/19/2021
Official Committee of Unsecured Creditors	12/4/2019	Shipping (013)	Invoice No: 686180090 Paid to: Fedex per Douglas Kopf Ship To: Jon	352222	1.00	\$35.44	3/13/2020
Official Committee of Unsecured Creditors	12/21/2020	Shipping (013)	Vendor: Federal Express; Invoice#: 722022220; Date: 12/21/2020	541327	0.00	\$36.55	1/19/2021
Official Committee of Unsecured Creditors	6/5/2020	Shipping (013)	Invoice No: 703820885 Paid to: Fedex per Heather Zimmer Ship To:	358158	1.00	\$38.16	8/24/2020
Official Committee of Unsecured Creditors	6/5/2020	Shipping (013)	Invoice No: 703820885 Paid to: Fedex per Heather Zimmer Ship To:	358158	1.00	\$38.16	8/24/2020
Official Committee of Unsecured Creditors	3/27/2020	Shipping (013)	Invoice No: 697745096 Paid to: Fedex per Redon Shehaj Ship To: Ch	355261	1.00	\$38.52	5/29/2020
Official Committee of Unsecured Creditors	3/27/2020	Shipping (013)	Invoice No: 697745096 Paid to: Fedex per Redon Shehaj Ship To: Se	355261	1.00	\$38.52	5/29/2020
Official Committee of Unsecured Creditors	3/27/2020	Shipping (013)	Invoice No: 697745096 Paid to: Fedex per Redon Shehaj Ship To: Kyl	355261	1.00	\$46.48	5/29/2020
Total Shipping						\$783.42	
Official Committee of Unsecured Creditors	3/27/2019	Teleconferencing (037)	Court hearing	341824	1.00	\$51.00	6/5/2019
Official Committee of Unsecured Creditors	6/10/2020	Teleconferencing (037)	COURTSOLUTIONS NEW YORK NY 842236901 20200609 53 3-09410	356648	1.00	\$70.00	7/16/2020
Official Committee of Unsecured Creditors	6/10/2020	Teleconferencing (037)	COURTSOLUTIONS NEW YORK NY 842236901 20200609 53 3-09410	356648	1.00	\$70.00	7/16/2020
Official Committee of Unsecured Creditors	6/18/2020	Teleconferencing (037)	COURTSOLUTIONS NEW YORK NY 842236901 20200617 53 3-09410	356648	1.00	\$70.00	7/16/2020
Official Committee of Unsecured Creditors	3/23/2019	Teleconferencing (037)	CCALL ID#9679490 LOS ANGELES CA 44912859 A967949 90011 03/2	341824	1.00	\$86.00	6/5/2019
Official Committee of Unsecured Creditors	3/27/2019	Teleconferencing (037)	Court hearing	342519	1.00	\$93.00	6/21/2019
Official Committee of Unsecured Creditors	3/2/2019	Teleconferencing (037)	CCALL ID#9587676 LOS ANGELES CA 44592027 A958767 10016 03/2	341824	1.00	\$107.00	6/5/2019
Total Teleconferencing						\$547.00	
Official Committee of Unsecured Creditors	2/12/2019	Velobind/binding (038)	Velobind/binding	341824	1.00	\$2.00	6/5/2019
Official Committee of Unsecured Creditors	2/12/2019	Velobind/binding (038)	Velobind/binding	341824	1.00	\$2.00	6/5/2019
Official Committee of Unsecured Creditors	11/7/2019	Velobind/binding (038)	Velobind/binding	352221	1.00	\$2.00	3/13/2020
Official Committee of Unsecured Creditors	12/2/2019	Velobind/binding (038)	Velobind/binding	352222	1.00	\$2.00	3/13/2020
Official Committee of Unsecured Creditors	1/14/2020	Velobind/binding (038)	Velobind/binding	352222	1.00	\$2.00	3/13/2020
Official Committee of Unsecured Creditors	8/24/2020	Velobind/binding (038)	Velobind/binding	538312	1.00	\$2.00	10/22/2020
Official Committee of Unsecured Creditors	5/23/2021	Velobind/binding (038)	Velobind/binding	547628	1.00	\$2.00	6/16/2021
Official Committee of Unsecured Creditors	11/20/2019	Velobind/binding (038)	Velobind/binding	352222	2.00	\$4.00	3/13/2020
Official Committee of Unsecured Creditors	8/25/2020	Velobind/binding (038)	Velobind/binding	538312	2.00	\$4.00	10/22/2020
Official Committee of Unsecured Creditors	9/1/2020	Velobind/binding (038)	Velobind/binding	538311	3.00	\$6.00	10/22/2020
Official Committee of Unsecured Creditors	9/1/2020	Velobind/binding (038)	Velobind/binding	538311	3.00	\$6.00	10/22/2020
Official Committee of Unsecured Creditors	2/10/2020	Velobind/binding (038)	Velobind/binding	352221	4.00	\$8.00	3/13/2020
Official Committee of Unsecured Creditors	9/2/2020	Velobind/binding (038)	Velobind/binding	538311	4.00	\$8.00	10/22/2020
Official Committee of Unsecured Creditors	9/2/2020	Velobind/binding (038)	Velobind/binding	538311	4.00	\$8.00	10/22/2020
Official Committee of Unsecured Creditors	11/5/2019	Velobind/binding (038)	Velobind/binding	352221	6.00	\$12.00	3/13/2020
Official Committee of Unsecured Creditors	6/5/2020	Velobind/binding (038)	Velobind/binding	356648	10.00	\$20.00	7/16/2020
Official Committee of Unsecured Creditors	12/4/2019	Velobind/binding (038)	Velobind/binding	352222	11.00	\$22.00	3/13/2020
Official Committee of Unsecured Creditors	8/5/2020	Velobind/binding (038)	Velobind/binding	538312	30.00	\$60.00	10/22/2020
Total Velobind/binding						\$172.00	
Grand total costs Billed						384,219.78	